

Inspection Date 0/11/2006
Time Start

HAZARDOUS WASTE INSPECTION REPORT ⊠ GENERATOR **☐** S Q GENERATOR

Time	Finish
T	Haz: 1556128
OR	Res: 1556130

				MED! 1330
Со	mpany name Dupont Automotive			
ΕP	A I.D. Number <u>PAD002311884</u>	Employe	r I.D. Number (EIN)	
Site	e Address 3401 Grays Ferry Avenue		· · · · · · · · · · · · · · · · · · ·	
Со	unty <u>Philadelphia</u>	Municipality Philadelph	ia Zip <u>1914</u>	6
Na	me of Inspector Laura Johnson			
Na	me & Title of Responsible Official Joh	in Weldon, Environmental	Coodinator	
Pe	rson Interviewed John Weldon, Larry	Lorenzi	Telephone (<u>215</u>) <u>5</u>	39-6629
Ma	iling Address (if different from above)	same		
Αm	nount of Hazardous Waste Generated	per Month: 80000	Pounds	Kgs
1.	Site Characterization:			
	STORAGE: Container T	anks	lldg. Drip Pad Other	
	PBR:	VTP	Other	
	GENERATOR TREATMENT C	ontainers	Containment Bldg.	☐ Drip Pad
2.	Universal Waste:	ity Handler 🔲 Small	Quantity Handler	
	Universal Waste Types			
3.	Hazardous Waste Transporters:			
	Transporter Name Dupont Co In	IC	License Number NJD	0002385730
	Transporter Name Marisol Inc			0002464544
	Transporter Name SJ Transport	ation Inc	License Number NJ0	071629976
4	Types of hazardous waste general	ted and destination facil	lity (location & type)	

Waste Code	Waste Description	Destination Facility
F005	Waste Flammable Liquid	Marisol Inc-NJ002454544
		125 Factory Lane
		Middlesex, NJ 08846
F003	Waste Commbustable Liquid	El Dupont Co Inc
		Chambers Works WWTP
		Deepwater, NJ 08023
D008	Waste Hazardous Solids	CWM Chem Services LLC
		1559 Balmer Rd
		Model City, NJ 11107

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name <u>Dupont Automotive</u> ID Number <u>PAD002311884</u> Date <u>8/11/ 06</u>

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

	2	3	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
×			Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
x			 Identification Number	262a.10	262.12	H002
<			 Authorized transporters only	262a.10	262.12(c)	H003
<	1		 Subsequent notification requirements met	262a.12(b)		H004
1			Proper manifest used	262a.10	262.21	H005
1			Manifests filled out correctly and completely	262a.20		H006
X			Manifests signed and routed properly	262a.23(a)	262.23	H007
X			Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
1	X		SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
1	X		SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<			Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X			Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
1			Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<			Specified records retained for three years	262a.10	262.40(c)	H014
<			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
1			Exception reporting procedures followed	262a.42	262.42	H016
<			Spill reporting procedures followed	262a.10	262.34(d)	H017
1			 PPC plan developed and implemented	262a.10	262.34(a)	H018
1			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
(Source reduction strategy prepared and available (LQG only)	262a.100	202.00	H020
1			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
#						

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name <u>Dupont Automotive</u> ID Number <u>PAD002311884</u> Date <u>8/11/06</u>

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2	2 3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
			CONTAINERS (Subchapter I)			
x			Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X			Containers of hazardous waste in good condition	265a.1	265.171	H026
x			Containers and stored waste compatible	265a.1	265.172	H027
X			Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X			Containers managed to prevent leaks	265a.1	265.173(b)	H029
X			Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X			Container storage areas inspected at least weekly	265a.1	265.174	H031
X			Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X			Proper containment and collection systems in place	265a.179		H033
×			Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
×			Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X			Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
×			Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

2540-FM-LRWM0406 Rev. 10/2001



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION 3UREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection	ID	
Field Code		

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

Site I.D.: PAD002311884 Site Name: Dupont-Marshall Labs Address: 3401 Grays Ferry Ave	Operator Name: same
Municipality: Philadelphia Responsible Official: John Weldon Person Interviewed: same Inspector: Laura Johnson eFACTS ID #: PF	Title: Environmental Coodinator Title: Title: Environmental Trainee
Inspection Date: 8 /11 / 2006 Type: Routine	No. of Violations: 0 Time: 10 am
Waste Description: Lab Trash Treatment: Yes No Type:	
Type of Storage: Containers Tanks Piles Disposition: Destination Facility	
Location:	Type:
Amount Generated:	_ lb./mo.
Waste Description: Empty Metal Containers Treatment: Yes No Type:	
Type of Storage: Containers Tanks Piles Disposition: Destination Facility	☐ Impoundments
Location:	
Amount Generated:	
Waste Description: Waste Water	
Treatment: Yes No Type: Type of Storage: Containers Tanks Piles Disposition: Destination Facility	☐ Impoundments
Location:	
Amount Generated:	_ lb./mo.
Waste Description: Waste Water	Waste Code: R306
Treatment: Yes No Type:	
Type of Storage: Containers Tanks Piles	· · · · · · · · · · · · · · · · · · ·
Disposition: Destination Facility	
Amount Generated:	

Site Name Dupont Automotive PAD002311884 Date

8/11/2006

INSPECTION REPORT - RESIDUAL WASTE GENERATOR (Cont'd)

2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance 1 - No Violation Observed

	STA	TUS	3			CHAPTER	LINE
1	2	3	4		MMENTS	CITATION	ITEM
	\boxtimes			Designated facility: valid permit? Permit Number (PA)		287.6	1
\boxtimes				Biennial report submitted by March 1 of each odd numbered year.		287.52(a)	2
\boxtimes				Written source reduction strategy on file and in effect.		287.53	3
\boxtimes				Waste reduction strategy covers all waste streams.		287.53(b)	4
\boxtimes				Reduction strategy updated every five years or when waste	or 🗌	287.53(c)	5
				manufacturing process changes.			
\boxtimes				Waste analysis performed: copy on file.		287.54	6
\boxtimes				Annual analysis or certification of waste submitted to Department an	d 🗌	287.54(b)(f)	7
			-	designated facility.		207 54(=)	
$ \boxtimes $	\sqcup		ш	Chemical analysis updated every five years or when waste	or 🗀	287.54(g)	8
K 2	——————————————————————————————————————			manufacturing process changes.		207.55	
	닉	片	11	Generator record keeping requirements.	片	287.55	9
3	Ш	Ш	Ш	Operation of disposal or processing facility without a permit.		287.101(a)	10
				STORAGE REQUIREMENTS			
\boxtimes				Residual waste not mixed with hazardous waste.		299.111(1)	11
\boxtimes				Waste stored as not to create a safety risk.		299.111(2)	12
\boxtimes				Residual waste not mixed with special handling waste.		299.111(3)	13
\boxtimes				Waste not blown or otherwise deposited outside storage area.		299.111(4)	14
\boxtimes				Storage area inspected; records available.		299.112(c)	15
\boxtimes				All waste stored less than one year.		299.113(a)	16
\boxtimes				Equipment maintained in operable condition.		299.114(a)	17
\boxtimes				Equipment cleaning frequencies maintained.		299.114(c)	18
\boxtimes				Vectors controlled and minimized.		299.115	19
\boxtimes				Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.	h 📗	299.116(a)(b)	20
	П	\Box		Waste stored to prevent groundwater degradation.	П	299.116(c)	21
	H	H	H	Sufficient number of properly constructed storage containers.	Ħ	299.121	22
		Ħ	H	Storage containers labeled properly.	Ħ	299.121(d)	23
1	Ħ	H	H	Storage container height and access requirements.	一一一	299.121(e)	24
الجُر	Ħ	H	H	Storage tank design standards.	一百	299.122	25
Ø	H	H	H	Storage tanks labeled properly.		299.122(a)	26
	Ħ	H	H	No putrescible waste or liquid waste stored in piles.	— H	299.112(d),	27
				The part of the pa	يبا	299.131(b)	
	\boxtimes			Waste storage pile area properly designed, constructed and maintained.		299.131	28
	\boxtimes			Storage pad or liner system properly designed and maintained.		299.132	29
	\boxtimes			Proper design and maintenance of leachate and runoff control systems.		299.133	30
	\boxtimes			Proper storage and containment of incinerator ash residue.		299.151	31
	\boxtimes			Proper storage and containment of friable asbestos containing waste.		299.152	32
	\boxtimes			Proper storage and containment of coal ash.		299.153	33
	\boxtimes			Proper storage and containment of PCB containing waste material.		299.154	34
	\boxtimes			Proper storage of whole and processed tires.	П	299.155	35
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Department of		NERAL					cycling and	
Environmental Prote	ction	INSPECTI	ON REPO	PRT	V	/aste	e Manag	ement
Type of Inspection	WM Identific	ation Number	Entry Time/D	ate		Exit T	ime/Date	
Routine	PAD002	2311884	311884 8/9/2006		8/11/2006			
Facility/Incident Name and Location						Munic	ipality	
Dupont Labs 3401 Gray	s Ferry A	ve 19146					ladelphia	1
						Coun	•	
						Phi	ladelphia	1
Name, Address of Responsible Officia				Title		_		
John Weldon				Enviror	ımental (Coor	dinator	
				Telephone			Interviewed	
21					-6629		Yes	No
REMARKS:								

A large quantity hazardous waste and residual waste inspection of Dupont Automotive-Marshall Labs took place on August 9, 2006 by Laura Johnson from the Department of Environmental Protection. The facility guide for the inspection was Larry Lorenzoni, Safety Coodinator.

The inspection began with the process engineering area, which is located in buildings 192 and 66. These building have several satellite accumulation areas, which were inspected. In building 192 the satellite accumulation on the first floor was observed. In this area there was a residual waste drum, an aqueous waste drum, a non-aqueous waste drum and a flammable waste drum. All of the drums appeared to be labeled correctly and were all closed at the time of the inspection. Building 66 was also observed and all of the drums were also correctly labeled and closed during the time of this inspection.

The inspection continued with a tour of the 250 Building in which the 90-day hazardous waste storage area is. This is the building where flammable products are also stored. The hazardous waste storage area is labeled and everything is kept clean and accessible. All of the drums observed appeared to be labeled correctly and dated. The earliest date that was seen was 6/20/2006 which is within the 90-day storage requirements. In this area the weekly inspection log for the hazardous waste was also observed. The log

Inspector Name Laura Johnson	Inspector Signature AUVA AMAN	Headquarters 2 East Main Street.	8/11/06
		Norristown, PA 19401	Telephone 484-250-5762
Person Interviewed Name To HW G. WELDON	Signature of Person Interviewed John J. Illeldn	Env. Coordinator	Telephone

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Department of	GENERAL	Bureau of Land Recycling and
Environmental Protection	Waste Management	
Facility/Incident Name and Location		Municipality
Dupont Automotive		Philadelphia
		County
3401 Grays Ferry Ave	Philadelphia 19146	

appears to be thoroughly kept and has been completed every week since 1/3/2006. Overall all of the drums in the storage area appear to be well maintained, labeled and closed.

The next area that was observed were some of the labs in the Main Lab Building 227. Three of the labs were observed. The main satellite accumulation areas in these labs come from parts washers, which were observed to be closed. In some of the parts washers there is a waste bucket which was observed to be labeled as hazardous waste and were closed. Again this area seems to be well maintained and clean.

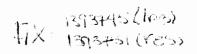
Lastly the records review took place on August 11, 2006. The records could not be accessed during the normal inspection due to the fact that John Weldon the Environmental Coordinator was not on site. The training records were first observed, these records appear to be thoroughly completed and up to date. The PPC plan was also observed, it was asked that the Department's contact information be updated to indicate the new phone number. The number was written in temporarily and will be permanently updated in the plan. The manifests for the 1st and 3rd quarter of 2005 and the 1st quarter of 2006 were observed. All of the manifests appear to be completed correctly and routed within the proper time limits. The residual waste manifests and bills of lading were also observed to be completed correctly. The Biennial reports for the hazardous waste and residual waste were also available and were reviewed. In 2005 the total amount of hazardous waste produced by the facility was 960,161 lbs. The residual waste 25R's and 26R's were available and were reviewed. These both appear to be completed correctly and thoroughly. Additionally, the hazardous waste storage weekly inspection logs for 2003-2005 were also reviewed and are all completed as they should be.

A copy of this inspection report will be reviewed and left with the facility.

No violations as a result of this inspection.

	1	
Inspector Name	Inspector Signature //	Date
Laura Johnson	J1 10 61	
i ,	Willed from	8/11/2006
<u> </u>	10000	
	Page f of	





nspection Date	1113/04
Time Start	130 pm
Time Finish	400 pm

HAZARDOUS WASTE INSPECTION REPORT ☐ S Q GENERATOR

Con	npany name <u>Dupont Aut</u>	omotive I.C	D. Number <u>PAD002311884</u>
	Address 3401 Grays Fe		
Cou	nty Philadelphia	Municipality Philadelphia	Zip_19126
	ne of Inspector Aleta L. I		
Nan	ne & Title of Responsible	e Official <u>John Weldon, Environmental Coordinato</u>	
Pers	son Interviewed <u>John W</u>	eldon and Shawn Smith Te	elephone (<u>215</u>) <u>539-6629</u>
Mail	ing Address (if different	from above)	
Amo	ount of Hazardous Wast	e Generated per Month: ~100,000 Pou	ınds Kgs
1.	Site Characterization:		
	STORAGE: Cont	ainer 🗌 Tanks 🔲 Containment Bldg. 🗍 Drip	Pad Other
	PBR:	ralization/WWTP 🔲 Reclaim	Other
	GENERATOR TREATM	MENT ☐ Containers ☐ Tanks ☐ 0	Containment Bldg.
2.	Universal Waste: 🔲	Large Quantity Handler	andler
	Universal Waste Ty	pes Fluorescent Tubes, Lead-Acid Batteries	
3.	Hazardous Waste Tra	•	
	Transporter Name	Marisol Li	cense Number NJD002454544
	Transporter Name	Dupont, Experimental Station Li	cense Number <u>DED003930807</u>
	Transporter Name	Dupont Co, Inc Li	cense Number NJD002385730
4.	Types of hazardous w	raste generated and destination facility (location	n & type).
	Waste Code	Waste Description	Destination Facility
	F003, F005, D001	Toluene, Xylene	E.I. Dupont Co. Inc.
	D001, D035	Tetrahydrofuran	Rt 141 Experimental Station
	D001, D002	Sodium Metabisulfite, Acrylic Acid	Wilmington, DE 19880
	F003, F005, D035	Hazardous Waste Liquid (Aqueous)	DED003930807
	D002	Potassium Hydroxide	Marisol Inc.
	D002	Methacrylic Acid	125 Factory Lane
	D001	Waste Resin Solution	Middlesex, NJ 08846
	D005	Barium Sulfate	NJD002454544

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COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

ID Number PAD0002311884 Site Name Dupont Automotive Date November 3, 2004 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance **STATUS** PA CIT. FED. CIT. LINE REQUIREMENT 25 PA Code 40 CFR NO. 262a.10 262.11 H001 Hazardous waste determination performed on all waste streams \boxtimes П Identification Number 262a.10 262.12 H002 \boxtimes Authorized transporters only 262a.10 262.12(c) H003 Subsequent notification requirements met 262a.12(b) H004 \boxtimes \boxtimes Proper manifest used 262a.10 262.21 H005 П П Manifests filled out correctly and completely 262a.20 H006 \boxtimes П П \Box Manifests signed and routed properly 262a.23(a) 262.23 H007 Generator waste accumulated on site for 90 days or less 262a.10 **B00H** \Box 262.34(a) \boxtimes SQG waste accumulated on site for 180 days max unless 262a.10 262.34(e)(f) H009 200 mile distance rule applies - 270 days \boxtimes SQG waste accumulated on-site never exceeds 6000 kg 262a.10 262.34(e)(f) H010 Ø П Satellite accumulation requirements complied with 262a.10 262.34(c) H011 П Personnel training program per 265.16 complied with 262a.10 \boxtimes П П 262.34(a)(4) H012 262.34(d) Ø Manifest exception and biennial reports retained for 3 years 262a.10 262.40(a)(b) H013 Specified records retained for three years 262a.10 \boxtimes 262.40(c) H014 \boxtimes Biennial reports submitted to the Department (LQG only) 262a.41 262.41 H015 \boxtimes Exception reporting procedures followed 262a.42 262.42 H016 Spill reporting procedures followed 262a.10 H017 262.34(d) PPC plan developed and implemented 262a.10 262.34(a) H018 Special requirements followed for international shipments 262a.10 262.50 H019 \boxtimes 262.60 \boxtimes H020 Source reduction strategy prepared and available (LQG only) 262a.100 \boxtimes Excluded waste complies with exclusionary requirements H021 261a.4 261.4 П П \Box \Box П

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Date November 3, 2004 ID Number PAD002311884 Site Name Dupont Automotive 3 - Not Determined 4 - Non Compliance 1 - No Violation Observed 2 - Not Applicable **STATUS** LINE PA CIT. FED CIT. 25 PA Code REQUIREMENT 40 CFR NO. **CONTAINERS** (Subchapter I) \boxtimes Containers managed in compliance with 40 CFR Part 265 262a.10 262.34 H025 Subpart I and 25 PA Code Chapter 265a Subchapter I \boxtimes \Box Containers of hazardous waste in good condition 265a.1 265.171 H026 265a.1 265.172 H027 \boxtimes \Box \Box Containers and stored waste compatible Containers kept closed except during addition or removal 265a.1 П 265.173(a) H028 of wastes 265.173(b) Containers managed to prevent leaks 265a.1 H029 Ø П 265a.173 \boxtimes Container configuration and spacing insures safe H030 management and access for inspection purposes and emergency equipment П П Container storage areas inspected at least weekly 265a.1 265.174 H031 X Ø П Special requirements for ignitable or reactive and 265a.1 265.176-177 H032 incompatible waste complied with П 265a.179 H033 \boxtimes Proper containment and collection systems in place Air emission standards complied with (AA, BB, CC) 265a.1 H034 \boxtimes П П П 265.178 Containers clearly marked with accumulation date and 262a.10 H035 262.34(a)(2) visible for inspection П Containers labeled "Hazardous Waste" 262a.10 H036 \boxtimes П 262.34(a)(3) Containers labeled accurately identify contents SWMA H037

6018.403(b)

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INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs

Identification Number: PAD002311884

Date of Inspection: Wednesday, November 3, 2004

Aleta L. Finney, Solid Waste Specialist with the Department, conducted a large quantity residual waste and a large quantity hazardous waste inspection. Present from the facility was John Weldon, Environmental Coordinator and Shawn Smith, Manager of Safety, Health and Environmental.

The inspection began with the process engineering area, which is located in buildings 192 and 66. These areas have wastes within satellite accumulation. There was construction going on in these areas at the time of the inspection. The first floors of each building had 4 drums of waste, including contaminated lab trash (residual waste), flammable solids, aqueous and non-aqueous hazardous waste. The second floors of each building had only 3 drums of hazardous waste; no residual waste was being stored here. All drums were closed and properly labeled.

Outside, there is a bermed area where totes of non-hazardous inks are stored. They are stored in 1 cubic yard totes and are normally taken out of the facility by tanker truck. There were 14 totes being stored here at the time of the inspection. All appeared to be labeled and none appeared to be leaking.

The inspection continued with a tour of Building 250. This building stores most of the facility's hazardous and residual wastes. The wastes include solvents, lab packs, contaminated lab trash, RCRA empty containers and universal wastes. This area was preparing for a shipment to Dupont's Experimental Station in Delaware, though the facility had just had a pickup from Marisol earlier in the week. According to Mr. Weldon, this facility has been very busy, such that waste generation has been increased. The drums and lab packs are normally stored on racked shelving. At the time of the inspection, the waste was being stored on the floor because of the early morning pickup the next day. The hazardous wastes were all closed and labeled with the words "hazardous waste". There were a couple of containers that did not have an accumulation date on them. Mr. Weldon stated that the wastes are coming down to this area so quickly from the satellite area that the facility had little time to put the date on them. Mr. Weldon also explained that those drums had just been brought down to the area that morning. The facility is reminded that once containers in satellite accumulation are full, they are to be dated and within three days brought to the 90-day storage area. The oldest accumulation date seen on any of the drums was October 1, 2004. All the drums appeared to be in good condition. The floor drains were clean and are connected to a sump, which lets out into an enclosed containment area should there ever be any spills in this building. The building is also equipped with overhead sprinklers and foam releasing equipment. The residual wastes are stored in wranglers (1 cubic yard containers) and drums. These were all labeled non-hazardous wastes. The facility has also istalled flammable storage cabinets to hold lab-pack wastes. These closets are being stored on the lower level or the racked shelving. There were no universal wastes observed being stored at the time of the inspection.

Finally, the paperwork was reviewed. The manifests appeared to be correctly completed and return copies seemed to be made available to the facility in a timely manner. Pictures of each load as well as the LDR's that are going to Marisol and the Experimental Station are kept with each manifested shipment. The non-hazardous manifests were also

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature)	John mailed to	o acilia Date 11	15/04
Inspector Signature)	at Tenney	Date i	15/04
File name: Dupont (rpt))	Page of	

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs

Identification Number: PAD002311884

Date of Inspection: Wednesday, November 3, 2004

made available and wastes properly tracked. The PPC plan was in order but due to some recent retirements, the plan needs some personnel updates and an update to the PADEP phone number (484-250-5900). The source reduction strategy for both the residual and hazardous wastes were also made available. Both of these reports should be updated by March 2005. The residual and hazardous waste biennial reports were also completed. The hazardous and residual waste inspection logs were also made available and appeared to be completed weekly. The hazardous waste personnel training records were also available for review. Mr. Weldon just finished the RCRA training before I arrived for my inspection on November 3, 2004.

No violations were cited.

The results of this inspection were reviewed with Mr. Weldon and Mr. Smith before leaving the facility. A copy it is report was sent to Mr. Smith on November 5, 2004.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) CODG	mailed to tacility	Date 11 3 04
Inspector Signature) Auto	Timeel	Date 115 (1)
File name: Dupont (rpt)		Pageof

2500-FM-LRWM0276 Rev. 5/99



TIX (1923) = 1272895 FIX (1923) = 1272897 COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date	9/24/03	_
	1:30 pm	_
	3:30 pm	

HAZARDOUS WASTE INSPECTION REPORT GENERATOR GENERATOR

Company name <u>Dupont Au</u>	tomotive I	D. Number <u>PAD002311884</u>			
Site Address 3401 Grays F	erry Avenue				
County Philadelphia	Municipality Philadelphia	Zip			
Name of Inspector <u>Aleta L.</u>	Finney				
Name & Title of Responsib	le Official <u>John Weldon, Environmental Coordina</u>	tor			
Person Interviewed Same	Т	elephone (<u>215</u>) <u>539-6629</u>			
Mailing Address (if differen	t from above)				
Amount of Hazardous Was	te Generated per Month: ~100,000 Po	undsKgs			
1. Site Characterization:	:				
STORAGE: 🛛 Con	tainer 🔲 Tanks 🔲 Containment Bldg. 🗌 Dri	p Pad Other			
PBR: Neu	tralization/WWTP 🔲 Reclaim	Other			
GENERATOR TREAT	MENT Containers Tanks	Containment Bldg.			
2. Universal Waste: 🗌	Large Quantity Handler Small Quantity I	łandler			
Universal Waste T	ypes Fluorescent Tubes, Lead-Acid Batteries				
3. Hazardous Waste Tra	nsporters:				
Transporter Name	Marisol L	icense Number NJD002454544			
-	Dupont, Experimental Station L				
•	Dupont Co, Inc L				
4. Types of hazardous v	vaste generated and destination facility (locati	on & type).			
Waste Code	Waste Description	Destination Facility			
F003, F005, D001	Toluene, Xylene	E.I. Dupont Co. Inc.			
D001, D035	Tetrahydrofuran	Rt 141 Experimental Station			
D001, D002	Sodium Metabisulfite, Acrylic Acid	Wilmington, DE 19880			
F003, F005, D035 Hazardous Waste Liquid (Aqueous DED003930807					
D002	Potassium Hydroxide	Marisol Inc.			
D002	Methacrylic Acid	125 Factory Lane			
D001	Waste Resin Solution	Middlesex, NJ 08846			
D005	Barium Sulfate	NJD002454544			

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COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name <u>Dupont Automotive</u> ID Number <u>PAD0002311884</u> Date <u>September 24, 2003</u>

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

ST	ATUS	6			PA CIT.	FED. CIT.	LINE
1	2	3	4	REQUIREMENT	25 PA Code	40 CFR	NO.
\boxtimes				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
\boxtimes				Identification Number	262a.10	262.12	H002
\boxtimes				Authorized transporters only	262a.10	262.12(c)	H003
\boxtimes				Subsequent notification requirements met	262a.12(b)		H004
\boxtimes				Proper manifest used	262a.10	262.21	H005
\boxtimes				Manifests filled out correctly and completely	262a.20		H006
\boxtimes				Manifests signed and routed properly	262a.23(a)	262.23	H007
\boxtimes				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	800H
	\boxtimes			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	\boxtimes			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
\boxtimes				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
\boxtimes				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
\boxtimes				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
\boxtimes				Specified records retained for three years	262a.10	262.40(c)	H014
\boxtimes				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
\boxtimes				Exception reporting procedures followed	262a.42	262.42	H016
\boxtimes				Spill reporting procedures followed	262a.10	262.34(d)	H017
\boxtimes				PPC plan developed and implemented	262a.10	262.34(a)	H018
\boxtimes				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
\boxtimes				Source reduction strategy prepared and available (LQG only)	262a.100		H020
\boxtimes				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
	П	П	\Box				

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Date September 24, 2003 ID Number PAD002311884 Site Name Dupont Automotive 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance **STATUS** LINE PA CIT. FED CIT. NO. REQUIREMENT 25 PA Code 40 CFR **CONTAINERS** (Subchapter I) H025 \boxtimes Containers managed in compliance with 40 CFR Part 265 262a.10 262.34 Subpart I and 25 PA Code Chapter 265a Subchapter I Containers of hazardous waste in good condition 265a.1 265.171 H026 H027 265a.1 265.172 Containers and stored waste compatible H028 265a.1 265.173(a) Containers kept closed except during addition or removal of wastes \boxtimes 265a.1 265.173(b) H029 Containers managed to prevent leaks 265a.173 H030 X Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment \boxtimes Container storage areas inspected at least weekly 265a.1 265.174 H031 \boxtimes 265a.1 265.176-177 H032 П Special requirements for ignitable or reactive and incompatible waste complied with H033 \boxtimes Proper containment and collection systems in place 265a.179 H034 Air emission standards complied with (AA, BB, CC) 265a.1 265.178 \Box Containers clearly marked with accumulation date and 262a.10 262.34(a)(2) H035 visible for inspection H036 X Containers labeled "Hazardous Waste" 262a.10 262.34(a)(3) H037 X SWMA Containers labeled accurately identify contents 6018.403(b)

(2)

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COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION 3UREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID	
Field Code	

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

Site I.D.: PAD002311884	Telephone #: 215-539-6629
Site Name: Dupont - Marshall Labs	Operator Name: same
Address: 3500 Grays Ferry Avenue	Address: same
Philadelphia, PA 19146	
Municipality: Philadelphia	County: Philadelphia
Responsible Official: John Weldon	Title: Environmental Coordinator
Person Interviewed: John Weldon	Title: Environmental Coordinator
Inspector: Aleta L. Finney	Title: Solid Waste Specialist
eFACTS ID #: PF	SF
Inspection Date: 9 /24 / 2003 Type: routine (1)	No. of Violations: 0 Time: 2 pm
Waste Description: Industrial Wastewater	Waste Code: R999
Treatment: Yes No Type:	
Type of Storage: Containers Tanks Piles	j
Disposition: Destination Facility POTW-Southwest Water P	ollution Control Plant
Location: Philadelphia	Type:
Amount Generated: 307 tons	lb./mo.
Waste Description: Contaminated lab trash	Waste Code: R710
Treatment: Yes No Type:	
Type of Storage: ☐ Containers ☐ Tanks ☐ Piles	i
Disposition: Destination Facility <u>Experimental Station-Dupo</u>	ont
Location: Wilmington, DE	Type: TSD
Amount Generated: 58 tons	lb./mo.
	·
Waste Description: RCRA Empty Metal Cans	Waste Code: R419
Treatment: Yes No Type:	
Type of Storage: Containers □ Tanks □ Piles	☐ Impoundments
Disposition: Destination Facility Experimental Station-Dupo	
Location: Wilmington, DE	
Amount Generated: 38 tons	lb./mo.
7 Hillouri Collorator. Go torio	
Waste Description:	Waste Code:
Treatment: Yes No Type:	
Type of Storage: Containers Tanks Piles	☐ Impoundments
Disposition: Destination Facility	
Location:	Type:
Amount Generated:	

Site Name | Dupont Coordinator |
ID Number | PAD002311884 |
Date | September 24, 2003

INSPECTION REPORT - RESIDUAL WASTE GENERATOR (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

- F2820 728	227		No. of the	No violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - I	200353407	A CONTRACTOR OF THE CONTRACTOR	a Proposition
	STA	200	100		AENT8	CHAPTER	LINE
1	2	3	4	GENERAL REQUIREMENTS	CHED	CITATION	ITEM
\boxtimes				Designated facility: valid permit? Permit Number (PA) D002311884	\Box	287.6	1
\boxtimes				Biennial report submitted by March 1 of each odd numbered year.		287.52(a)	2
\boxtimes				Written source reduction strategy on file and in effect.		287.53	3
X				Waste reduction strategy covers all waste streams.		287.53(b)	4
X				Reduction strategy updated every five years or when waste or manufacturing process changes.		287.53(c)	5
\boxtimes	IT	П	П	Waste analysis performed: copy on file.	\Box	287.54	6
Ø				Annual analysis or certification of waste submitted to Department and designated facility.		287.54(b)(f)	7
\boxtimes				Chemical analysis updated every five years or when waste or manufacturing process changes.		287.54(g)	8
\boxtimes		\Box	\Box	Generator record keeping requirements.	П	287.55	9
d	H	H	H	Operation of disposal or processing facility without a permit.	Ħ	287.101(a)	10
<u>V</u>	1	╀┺┹	 -			2011101(-)	
				STORAGE REQUIREMENTS			
\boxtimes				Residual waste not mixed with hazardous waste.		299.111(1)	11
\boxtimes				Waste stored as not to create a safety risk.		299.111(2)	12
\boxtimes				Residual waste not mixed with special handling waste.		299.111(3)	13
\boxtimes				Waste not blown or otherwise deposited outside storage area.		299.111(4)	14
\boxtimes				Storage area inspected; records available.		299.112(c)	15
\boxtimes				All waste stored less than one year.		299.113(a)	16
Ø				Equipment maintained in operable condition.		299.114(a)	17
X				Equipment cleaning frequencies maintained.		299.114(c)	18
X				Vectors controlled and minimized.		299.115	19
X				Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.		299.116(a)(b)	20
X	\Box	\Box	\sqcap	Waste stored to prevent groundwater degradation.		299.116(c)	21
Ø				Sufficient number of properly constructed storage containers.	П	299.121	22
Ø	T	T	m	Storage containers labeled properly.	П	299.121(d)	23
X	m	th	th	Storage container height and access requirements.	Ħ	299.121(e)	24
Ħ	図	一	H	Storage tank design standards.	Ħ	299.122	25
Ħ		Ħ	H	Storage tanks labeled properly.	一一	299.122(a)	26
岗	鬥	H	H	No putrescible waste or liquid waste stored in piles.	一一	299.112(d),	27
		1-		The part obsides waste of inquire marter of order in private		299.131(b)	
П	M		П	Waste storage pile area properly designed, constructed and maintained.		299.131	28
Ħ	Ø	情	旨	Storage pad or liner system properly designed and maintained.	一一	299.132	29
П		T	Ħ	Proper design and maintenance of leachate and runoff control systems.	Ħ	299.133	30
片	岗	tH	計	Proper storage and containment of incinerator ash residue.	Ħ	299.151	31
H	岗	怈	H	Proper storage and containment of friable asbestos containing waste.	十	299.152	32
믐		片	H	Proper storage and containment of mable aspectos containing waste.	+	299.153	33
片	岗	卌	H	Proper storage and containment of ocal ash. Proper storage and containment of PCB containing waste material.	片	299.154	34
H	H	H	H	Proper storage of whole and processed tires.	\dashv	299.155	35
片	H	片		Troper atorage of whole and processed thes.	+	233.100	133
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INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs

Identification Number: PAD002311884

Date of Inspection: Wednesday, September 24, 2003

Aleta L. Finney, Solid Waste Specialist with the Department, conducted a large quantity residual waste and a large quantity hazardous waste inspection. Present from the facility was John Weldon, Environmental Coordinator and Bill Gillan, Manager of Safety, Health and Environmental.

The inspection began with the process engineering area, which is located in building 192 and 66. This area has several types of satellite accumulation areas. Building 192 has two accumulation areas-one on each floor of the building. There were four drums on the lower floor and three drums on the upper floor. Building 66 also has two accumulation areas on an upper and lower floor. The drums contained residual waste, aqueous waste, non-aqueous waste and flammable waste containing solids. All drums were closed and properly labeled.

The inspection continued with a tour of Building 250. This building stores the facility's hazardous and residual wastes. The wastes include solvents, lab packs, contaminated lab trash, RCRA empty containers and universal wastes. This area was pretty empty at the time of the inspection. Mr. Weldon stated that the facility just had a pickup earlier in the week. The drums and lab packs are stored on racked shelving and were inspected. They were all closed and labeled properly with the accumulation date, generator information and the words "hazardous waste". The oldest accumulation date seen on any of the drums was August 20, 2003. All the drums appeared to be in good condition. The floor drains were clean and are connected to a sump, which lets out into an enclosed containment area should there ever be any spills in this building. The building is also equipped with overhead sprinklers and foam releasing equipment. According to both Mr. Gillan and Mr. Weldon, the facility has never had to put this equipment into practice, as there have never been any spills at the facility. The residual wastes are stored in wranglers (1 cubic yard containers) and drums. These were all labeled non-hazardous wastes. The facility also had 3 packages of fluorescent tubing that were properly packaged. It is recommended that the facility also put labels on these packages stating that they are waste bulbs.

Finally, the paperwork was reviewed. The manifests appeared to be correctly completed and return copies seemed to be made available to the facility in a timely manner. Pictures of each load as well as the LDR's that are going to Marisol are kept with each manifested shipment. The PPC plan was in order including updates on all appropriate phone numbers. The source reduction strategy for both the residual and hazardous wastes were also made available. The residual and hazardous waste biennial reports were also completed. The hazardous and residual waste inspection logs were also made available and appeared to be completed. The hazardous waste personnel training records were also available for review. The company last did its training in December 2002 and will be doing the next one in early fall of 2003.

No violations were observed.

The results of this inspection were reviewed with and a copy of this report was left with Mr. Weldon before leaving the facility.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that e copy was left with the person.

Person Interviewed (Signature) (Illean 9/24/03

Inspector Signature) Date 9/24/03

File name: Dupont (rpt)

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COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Dupont Automotive	ID Number	PAD0002311884	Date August 22, 2002	
	2 - Not Applicable	3 - Not Determined	4 - Non Compliance	

ST	STATUS						
1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
\boxtimes				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
\boxtimes				Identification Number	262a.10	262.12	H002
\boxtimes				Authorized transporters only	262a.10	262.12(c)	H003
\boxtimes				Subsequent notification requirements met	262a.12(b)		H004
\boxtimes				Proper manifest used	262a.10	262.21	H005
\boxtimes				Manifests filled out correctly and completely	262a.20		H006
\boxtimes				Manifests signed and routed properly	262a.23(a)	262.23	H007
\boxtimes				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	\boxtimes			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	\boxtimes			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
\boxtimes				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
\boxtimes				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
\boxtimes				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
\boxtimes				Specified records retained for three years	262a.10	262.40(c)	H014
\boxtimes				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
\boxtimes				Exception reporting procedures followed	262a.42	262.42	H016
\boxtimes				Spill reporting procedures followed	262a.10	262.34(d)	H017
\boxtimes				PPC plan developed and implemented	262a.10	262.34(a)	H018
				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
\boxtimes				Source reduction strategy prepared and available (LQG only)	262a.100		H020
\boxtimes				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
			П				

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COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site	Nan	ne <u>Dı</u>	upont	Automotive ID Number PAD002311884	Date Augu	ust 22, 2002	_
		1	- No	Violation Observed 2 - Not Applicable 3 - Not Determined	4 - Non Com	npliance	
STA	TUS	6			PA CIT.	FED CIT.	LINE
1	2	3	4	REQUIREMENT	25 PA Code	40 CFR	NO.
				CONTAINERS (Subchapter I)			
\boxtimes				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
\boxtimes				Containers of hazardous waste in good condition	265a.1	265.171	H026
\boxtimes				Containers and stored waste compatible	265a.1	265.172	H027
\boxtimes				Containers kept closed except during addition or removal 265a.1 265.173(a) of wastes			
\boxtimes				Containers managed to prevent leaks	265a.1	265.173(b)	H029
\boxtimes				Container configuration and spacing insures safe 265a.173 Hand access for inspection purposes and emergency equipment			
\boxtimes				Container storage areas inspected at least weekly	265a.1	265.174	H031
\boxtimes				Special requirements for ignitable or reactive and incompatible waste complied with 265a.1 265.176-177			H032
\boxtimes				Proper containment and collection systems in place	265a.179		H033
\boxtimes				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
\boxtimes				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
\boxtimes				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
\boxtimes				Containers labeled accurately identify contents	SWMA		H037

6018.403(b)

(2)

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COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION 3UREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID 1131416
Field Code 555122

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

Site I.D.: PAD002311884	Telephone #: 215-539-6629			
Site Name: Dupont - Marshall Labs	Operator Name: same			
Address: 3500 Grays Ferry Avenue	Address: same			
Philadelphia, PA 19146				
Municipality: Philadelphia				
Responsible Official: John Weldon				
Person Interviewed: John Weldon				
Inspector: Aleta L. Finney				
eFACTS ID #: PF				
Inspection Date: 8 /22 / 2002 Type: routine (1)				
Waste Description: <u>Inclustrial Waste Water</u>	Waste Code: PGGG			
Treatment: Yes No Type:				
Type of Storage: Containers Tanks Piles	☐ Impoundments			
Disposition: Destination Facility				
Location:	Туре:			
Amount Generated: 316 4605	-l b./mo .			
Waste Description: Contany nated Cab Irash	Waste Code:			
Treatment: Yes No Type:				
Type of Storage: Containers Tanks Piles				
Disposition: Destination Facility Examental St	ation-Duport			
Location: Wilmington, DE	Туре:			
Amount Generated: Significant	lb./mo.			
and the second s				
Waste Description: RCKA Empty Metal Can	Waste Code:			
Treatment: Yes No Type:				
Type of Storage: ☑ Containers ☐ Tanks ☐ Piles				
Disposition: Destination Facility CASCINE TO State				
Location: Wilmington, DE	Time			
Amount Generated:				
Amount Generated:	lb./mo.			
	West Oak			
Waste Description:				
Type of Storage: Containers Tanks Piles	☐ Impoundments			
Disposition: Destination Facility				
Location:	Туре:			
Amount Generated:	lb./mo.			

Site Name ID Number PAD002311884 Date

Dupont Coordinator

August 22, 2002

INSPECTION REPORT - RESIDUAL WASTE GENERATOR (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

STATUS				CHAPTER	LINE		
1	2	3	4	GENERAL REQUIREMENTS ATTA		CITATION	ITEM
\boxtimes		П	П	Designated facility: valid permit? Permit Number (PA) D002311884		287.6	1
\boxtimes				Biennial report submitted by March 1 of each odd numbered year.		287.52(a)	2
\boxtimes				Written source reduction strategy on file and in effect.		287.53	3
\boxtimes		ITT	П	Waste reduction strategy covers all waste streams.		287.53(b)	4
X	П			Reduction strategy updated every five years or when waste or		287.53(c)	5
				manufacturing process changes.			
\boxtimes				Waste analysis performed: copy on file.		287.54	6
\boxtimes				Annual analysis or certification of waste submitted to Department and		287.54(b)(f)	7
				designated facility.			
\boxtimes				Chemical analysis updated every five years or when waste or		287.54(g)	8
		İ		manufacturing process changes.			
\boxtimes				Generator record keeping requirements.		287.55	9
\boxtimes				Operation of disposal or processing facility without a permit.		287.101(a)	10
				STORAGE REQUIREMENTS			
\boxtimes	П	\Box	П	Residual waste not mixed with hazardous waste.		299.111(1)	11
X	I	IT	IT	Waste stored as not to create a safety risk.	n	299.111(2)	12
Ø	鬥	厅	H	Residual waste not mixed with special handling waste.	一一	299.111(3)	13
d	計	m	片	Waste not blown or otherwise deposited outside storage area.	Ħ	299.111(4)	14
X	片	H	H	Storage area inspected; records available.	Ħ	299.112(c)	15
X	H	計	H	All waste stored less than one year.	Ħ	299.113(a)	16
X	計	H	H	Equipment maintained in operable condition.	Ħ	299.114(a)	17
	片	H	H	Equipment cleaning frequencies maintained.	Ħ	299.114(c)	18
X	H	H	H	Vectors controlled and minimized.	Ħ	299.115	19
X	H	H	H	Run on, runoff minimized; storage areas managed in accordance with	H	299.116(a)(b)	20
23		-		Clean Streams Law.	ب	200.110(0)(2)	20
\boxtimes		П		Waste stored to prevent groundwater degradation.		299.116(c)	21
X				Sufficient number of properly constructed storage containers.		299.121	22
\boxtimes				Storage containers labeled properly.		299.121(d)	23
X	П	I		Storage container height and access requirements.		299.121(e)	24
	X					25	
	\boxtimes			Storage tanks labeled properly.		299.122(a)	26
\boxtimes				No putrescible waste or liquid waste stored in piles.	П	299.112(d),	27
						299.131(b)	
	\boxtimes			Waste storage pile area properly designed, constructed and maintained.		299.131	28
	\boxtimes			Storage pad or liner system properly designed and maintained.		299.132	29
	\boxtimes			Proper design and maintenance of leachate and runoff control systems.		299.133	30
	\boxtimes			Proper storage and containment of incinerator ash residue.		299.151	31
	\boxtimes			Proper storage and containment of friable asbestos containing waste.		299.152	32
	X			Proper storage and containment of coal ash.		299.153	33
	X			Proper storage and containment of PCB containing waste material.		299.154	34
	X			Proper storage of whole and processed tires.		299.155	35
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INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs

Identification Number: PAD002311884

Date of Inspection: Thursday, August 22, 2002

A large quantity residual waste and a large quantity hazardous waste inspection was conducted by Aleta L. Finney, Solid Waste Specialist with the Department. Present from the facility was John Weldon, Environmental Coordinator.

The inspection began with a tour of Building 250. This building stores the facility's hazardous and residual wastes. The wastes include solvents, lab packs, contaminated lab trash, RCRA empty containers and universal wastes. This area was unusually full due to the downtime of the incinerator at Dupont's Experimental Station located in Delaware. Mr. Weldon stated that they should again start taking waste down to that facility in one week. The drums and lab packs are stored on racked shelving and were inspected. They were all closed and labeled properly with the accumulation date, generator information and the words "hazardous waste". The oldest accumulation date seen on any of the drums was July 11, 2002. All the drums appeared to be in good condition. The floor drains were clean and are connected to a sump to collect any spilled material. The residual wastes were stored in wranglers (1 cubic yard containers) and drums. These were all labeled non-hazardous wastes.

Several of the satellite accumulation areas, including Processing Engineering and Dispersion Building, were inspected. These areas each had 2 drums of hazardous aqueous and non-aqueous wastes as well as contaminated plant trash. All drums were closed and properly labeled. There were also some drums that have been determined to be waste by the process area. There were 76 drums awaiting movement to hazardous waste storage area. This will be done by tonight or tomorrow.

Finally, the paperwork was reviewed. The manifests appeared to be correctly completed and return copies seemed to be made available to the facility in a timely manner. Pictures of each load as well as the LDR's are kept with each manifested shipment. The PPC plan was in order including updates on all appropriate phone numbers. The source reduction strategy for both the residual and hazardous wastes were also made available. The residual and hazardous waste biennial reports were also completed. The hazardous and residual waste inspection logs were also made available and appeared to be completed. The hazardous waste personnel training records were also available for review. The company last did its training in May 2001 and will be doing the next one in November 2002. The chemical analyses for the residual waste were also completed and made available.

No violations were observed.

The results of this inspection were reviewed with and a copy of this report was left with Mr. Weldon before leaving the facility.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) Waldon	Date \$/22/02
Inspector Signature) Alla C. Trinary	Date 8 22102
File name: Dupont (rpt)	Page(of (

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INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs

Identification Number: PAD002311884 Date of Inspection: Friday, April 14, 2000

Aleta L. Finney and Cheri Niemeyer, Solid Waste Specialists with the Department conducted a follow-up inspection of Dupont Automotive-Marshall Labs. Present from the facility was John Weldon, Environmental Coordinator.

The violation noted in the previous inspection report was a source reduction strategy (SRS) that was not up-to-date. The SRS has now been completed and was sent to Mr. Calvin Ligons of this regional office. Correspondence from Mr. Weldon was received the same day as this inspection stating the same.

This violation has been corrected.

The results of this inspection were reviewed with Mr. Weldon before leaving the facility.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) COPY Moiled to	tacility Date 4/20/2000
Inspector Signature) Illa C. Truney	3
File name: Dupont Labs 4-14-2000.doc	Page

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2540-FM-LRWM0406 Rev. 7/2001



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION 3UREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID	
Field Code	

	SIDUAL WAS IE GENERATOR
Site I.D.: PADCO23/1884	Telephone #: (215)589-6629
site Name: Duxot Labs-Marshall	Operator Name: ~CUMP
Address: 3500 Grays Ferry Avenue Philadelphia, At 19146	Address: Same
Philadelphia, PP 19146	
Municipality: Philadyphia	County: Philadelphia
Responsible Official: John Welcon	
Person Interviewed: The Welden	
eFACTS ID #: PF	Title:
Inspection Date: 8 /23/2001 Type: Douting	No. of Violations: Time: 1:30
Waste Description: <u>Industrial Waste Water</u>	Waste Code: <u>K999</u>
Treatment: Yes V No Type:	
Type of Storage: Containers Tanks Piles	
Disposition: Destination Facility POTW	
Location:	Type:
Amount Generated: 318 Tons	_ lb./mo.
Waste Description: Contaminated Lab Trash	Naste Code:
Treatment: Yes You Type:	
Type of Storage: Containers Tanks Piles	
Disposition: Destination Facility Experimental State	on - Dupont
Location: Wilmington, DE	
Amount Generated:	_ lb./mo.
Waste Description: KCRA Empty Metal Cans	Waste Code:
Treatment: Yes No Type:	
Type of Storage: Containers Tanks Piles	☐ Impoundments
Disposition: Destination Facility Experimental State	on-Depont
Location: Wilmington, DE	Туре:
Amount Generated:	lb./mo.
Waste Description:	Waste Code:
Treatment: Yes No Type:	
Type of Storage: Containers Tanks Piles	☐ Impoundments
Disposition: Destination Facility	}
Location:	
Amount Generated:	

Site Name
ID Number
PANCO2311664

Available

PANCO2311664

INSPECTION REPORT - RESIDUAL WASTE GENERATOR (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

					T .			Tomphance	
	ST.	1	JS					CHAPTER	LINE
1	2	1		4		MME! TACH		CITATION	ITEM
X	<u> 2</u> 200000		7	~~	Designated facility: valid permit? Permit Number (PA) \(\)\(\)\(\)\(\)\(\)\(\)\(\)\(8.0000000		287.6	
岗	┼늗	╟╞	╬	H	Biennial report submitted by March 1 of each odd numbered year.		4		1 -
	╁늗	╎┼╞╸	╬	片	Written source reduction strategy on file and in effect.		╣-	287.52(a) 287.53	2
	 ⊨	╎┤┝╸	╬	片	Waste reduction strategy covers all waste streams.		+		3
	╁┾	┼╞	┽┼	片	Reduction strategy updated every five years or when waste of		╡	287.53(b)	4
	$ \sqcup$	╎┞┶	۱۲	ш), f		287.53(c)	5
	-	-	┪	_	manufacturing process changes.		_	287.54	+
X	붜	╎┝╸	╬	片	Waste analysis performed: copy on file. Annual analysis or certification of waste submitted to Department an	_ 	┪		6
	ш	-	┛╽	ָ ע	, and the state of	ս լ		287.54(b)(f)	1'
la la	designated facility. Chemical analysis updated every five years or when waste or 287.54(g) 8						- 		
X	Chemical analysis updated every five years or when waste or 287.54(g) 8 manufacturing process changes.						8		
 	KZI	┢	1	-			_	207.55	
	X		 	片	Generator record keeping requirements.		۲.,	287.55	9
ш	Ø	┸	4	Щ	Operation of disposal or processing facility without a permit.			287.101(a)	10
					STORAGE REQUIREMENTS				
M	П	1	1		Residual waste not mixed with hazardous waste.			299.111(1)	11
A	Ħ	╁┝╴	H		Waste stored as not to create a safety risk.	-	7	299.111(2)	12
X	Ħ	1	įή	=	Residual waste not mixed with special handling waste.	٦	7	299.111(3)	13
X	H	╁┝╴	H	╡	Waste not blown or otherwise deposited outside storage area.	7	1	299.111(4)	14
X	H	╁	Ш		Storage area inspected; records available.	7	┪┪	299.112(c)	15
X	H	╁╞═	$\forall i$	╡	All waste stored less than one year.	ڄ -	┥┤	299.113(a)	16
X	H	┝	Н	=	Equipment maintained in operable condition.	 	╡┤	299.114(a)	17
X	片	╁╞═	╁	╡┼	Equipment cleaning frequencies maintained.		╡┤	299.114(c)	18
X	片	-	₩	┽┼	Vectors controlled and minimized.	 -	-	287.115	19
X	片	╠	╁	╡┼	Run on, runoff minimized; storage areas managed in accordance with			299.116(a)(b)	20
	Ц	-	1	-1	Clean Streams Law.	' L	۱ ۲	299.110(a)(b)	20
X	$\overline{}$		ı	- 	Waste stored to prevent groundwater degradation.		4	299.116(c)	21
	+	H	+	╡┼	Sufficient number of properly constructed storage containers.		┥┤	299.121	22
	+	H	+	╡┼			╡┤		23
X	片	H	+	┵	Storage containers labeled properly.	누	╃┼	287.121(d)	24
X	닞	닏	1	┽┼	Storage container height and access requirements.	┉┾	╬┼	287.121(e)	
	X	닏	Ļ	┽	Storage tank design standards.	<u> </u> _		299.122	25
	X.	닏	۱Ļ	4	Storage tanks labeled properly.	<u> </u>		287.122 (a)	26
	Ш	L	L	.	No putrescible waste or liquid waste stored in piles.	L		299.112(d),	27
 	7		+	-,	Market advanced to the second			299.131(b)	20
	兴	닏	╁		Waste storage pile area properly designed, constructed and maintained.		_	299.131	28
	X	Щ	╁		Storage pad or liner system properly designed and maintained.			299.132	29
	X	닏	↓ L		Proper design and maintenance of leachate and runoff control systems.			299.133	30
	X	Ц	1		Proper storage and containment of incinerator ash residue.	<u> </u> _	_	299.151	31
_	M	Ц	ĮĻ,		Proper storage and containment of friable asbestos containing waste.	L		299.152	32
_	X		<u> [</u>		Proper storage and containment of coal ash.		_	299.153	33
	X				Proper storage and containment of PCB containing waste material.			299.154	34
					Proper storage of whole and processed tires.		\prod	299.155	35
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2500-FM-LRWM0276 Rev. 5/99



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date	8/23/2001
Time Start	1:30 pm
Time Finish	4:30 pm

HAZARDOUS WASTE INS	SPECTION REPORT
□ GENERATOR	S Q GENERATOR

_				
Company name	yout Automotive		I.D. Number PADO	062311884
	Grays Ferry Aver			
	Municipali		hia zip 191	46
Name of Inspector A	leta L. Finney			
Name & Title of Respon	onsible Official John Wel	don, Environ	wental Coordin	ator
	idn Weldon			
	erent from above)			
Amount of Hazardous \	Waste Generated per Month: _	~ 125,000	Pounds	Kg
1. Site Characterizat	ion:			
STORAGE: 🛛 0	Container	ntainment Bldg. 🗌	Drip Pad Other	
PBR: □ N	leutralization/WWTP		Other	
	ATMENT		Containment Bldg.	Drip Pad
	☐ Large Quantity Handler		Ā	
	Types <u>Flucrescent lu</u>	ber, lead-1	4CIO Datteries	
3. Hazardous Waste 7			License Number 150	m2454544
Transporter Nam	ne Dupont Co, Inc		License Number DED	
·	e			
4. Types of nazardous	waste generated and destin	ation facility (loca	ition & type).	
Waste Code	Waste Descri	iption	Destination F	acility
F003, F005, D001	Toluene Xylene		E.I. Dusant	Co Inc.
DOO1, DO35	Tetrahydrofuran		RE141 Experiment	tal Station
D001, D002	Sodium Metabisulfit	e Acrylic Acid	Wilmington, DE	0889
FOC3, FOO5, DOSS	Hazardaus Waste Li	guid (Aguecus)	DED003930807	
DC03	Potassium Hydroxid		Marisd Inc.	
D009-	Methocrylic Acid		125 Factory La	ne
D001	waste resin solution	ſΨ.	Middlesex, NJ	08846
DC05	Barium Sulfate		NJD 00245454	4

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Dupont-Marshall Cabs ID Number PADOD311884 Date August 23, 200

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

_	1	2	3	4 REQUIREMENT	PA CIT. 25 PA Cod	FED. CIT. e 40 CFR	LINE NO.
1	Χ			Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
	XXX			Identification Number	262a.10	262.12	H002
	<u>X</u>	_		Authorized transporters only	262a.10	262.12(c)	H003
	<u> </u>			Subsequent notification requirements met	262a.12(b)		H004
	<	\perp		Proper manifest used	262a.10	262.21	H005
X		_	_	Manifests filled out correctly and completely	262a.20		H006
)		\perp	\perp	Manifests signed and routed properly	262a.23(a)	262.23	H007
			\perp	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	L	X		SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
L	X	(\perp	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X	L	\perp	\perp	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
χ				Manifest exception and biennial reports retained for 3 years	262a.10	252.40(a)(b)	H013
X		L		Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	252.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50	H019
1						252.60	
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
4				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
T	T	\top					
T	T	T	\top				
T	T	T	\top				
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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS **FACILITY SPECIFICS**

Site Name Deport Labs Marshall 10 Number PAD002311884

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined

4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
Ė	Ī	Ĭ	Ċ	CONTAINERS (Subchapter I)			1
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173	-	H030
X	I			Container storage areas inspected at least weekly	265a.1	265.174	H031
X			•	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X	T	\top	T	Proper containment and collection systems in place	265a.179		H033
X	T	T	T	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X	T	T	,	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	HC35
X	T	T	C	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
			C	Containers labeled accurately identify contents	SWMA		H037
					6018.403(b) (2)		

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs

Identification Number: PAD002311884

Date of Inspection: Thursday, August 23, 2001

A large quantity residual waste and a large quantity hazardous waste inspection was conducted by Aleta L. Finney, Solid Waste Specialist with the Department. Present from the facility was John Weldon, Environmental Coordinator and Linda Bjornson, Environmental Specialist.

The inspection began with a tour of Building 250. This building stores the facility's hazardous wastes. The wastes include solvents, lab packs and universal wastes. The drums are stored on racked shelving and were inspected. They were all closed and labeled properly with the accumulation date, generator information and the words "hazardous waste". The oldest accumulation date seen on any of the drums was July 8, 2001. All the drums appeared to be in good condition. The floor drains were clean and are connected to a sump to collect any spilled material. There was no residual waste stored here at this time as the facility had just had a pick-up of material.

Two labs were examined next. Both labs have 2 5-gallon pails for the accumulation of both aqueous and non-aqueous hazardous waste. They were closed and properly labeled. Any lab pack material is collected on a cart and taken to the 250 building for storage and packing.

The resin area was inspected next. There are two floors of production that occur in this building. Both floors contain a satellite accumulation area for both aqueous and non-aqueous wastes. The drums had funnels with lids in the bungholes. All of these drums were properly labeled with the words hazardous waste.

Finally, the paperwork was reviewed. The manifests appeared to be correctly completed and return copies seemed to be made available to the facility in a timely manner. Pictures of each load as well as the LDR's are kept with each manifested shipment. The PPC plan was in order with the exception of a couple of incorrect phone numbers. Mr. Weldon stated that this would be taken care of in a timely manner. The source reduction strategy for both the residual and hazardous wastes were also made available. The residual waste biennial report was also completed. The hazardous waste inspection logs were also made available and appeared to be completed. The hazardous waste personnel training records were also available for review. The company last did its training in May 2001.

No violations were observed.

A copy of this report was left with Mr. Weldon before leaving the facility.

RECOMMENDATIONS:

- 1) Crushing of fluorescent tubes should be discontinued promptly.
- 2) Update PPC plan phone numbers.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection. Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) 1 Malilin	Date 8/23/01
Inspector Signature) Aleta L Tinney	Date 8/23/2001
File name: Dupont-Marshall Labs.doc	Page 6 of 6



Inspection Date	3/8/2000
	2:30 pm
Time Finish	4:30pm

H	IAZARDOUS WASTE II	NSPI	ECTION REPORT
X	GENERATOR		S Q GENERATOR

Con	npany name Du Aw	+ Autrmotive	D. Number 14100231684
		ays Ferry Avenue	The state of the s
Cou	inty Philadelphia	Municipality Philadelishia	Zin 19141a
	ne of Inspector Aich		ΣΙΡ <u>- ((()) </u>
		e Official Victor Forte	
		n Weldon	Telephone ()
	ling Address (if different		
	-	te Generated per Month: <u>ペックの</u> の	ounds Kgs
	Site Characterization:		
	STORAGE: X Cont	ainer 🔲 Tanks 🔲 Containment Bldg. 🔲 Dr	ip Pad Other
	PBR: Neut	ralization/WWTP 🔲 Reclaim	Other
	GENERATOR TREATM	MENT ☐ Containers ☐ Tanks ☐	Containment Bldg.
2.		Large Quantity Handler	
	Universal Waste Ty	ypes <u>Fluorescent Tubes</u> , Lead-Acid	Batteries
3.	Hazardous Waste Tra	nsporters:	•
	Transporter Name	Marisol	License Number NTDEP 2809
	Transporter Name	EI Dupont Co., Inc	License Number DE-HW-433
	Transporter Name		License Number
4.	Types of hazardous w	vaste generated and destination facility (loca	tion & type).
	Waste Code	Waste Description	Destination Facility
	F005, F003,	xylene, toluene, MEK, acetone	Marisol Inc.
	DOC1, DO35	tetrahydrofuran	125 Factory Lane
	0009	ivasteflammable liquid	Middlesex, NJ 08846
		Solid haz waste-filter media,	NID002454544
		Daint + resin solids, glass, metal	EIDUSONT Co., Inc
	P028	Paint + resin solids, glass, metal plastic, waste benzyl chloride	Rt 141 - Experimental Station
	PC03	mercury	Wilmington, DE 19880
		Styrene	DED C03930807

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Duport Automotive ID Number PASCO231864 Date 3/8/2000

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
Χ				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
			X	Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

HAZARDOUS WASTE INSPECTION REPORT **GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS**

HONICTIVE ID Number PADCC2311664 Date 3/8/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined

4 - Non Compliance

STATUS

1 2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
			CONTAINERS (Subchapter I)			
X			Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X			Containers of hazardous waste in good condition	265a.1	265.171	H026
X	\perp		Containers and stored waste compatible	265a.1	265.172	H027
X			Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X			Containers managed to prevent leaks	265a.1	265.173(b)	H029
X			Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X			Container storage areas inspected at least weekly	265a.1	265.174	H031
X			Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X			Proper containment and collection systems in place	265a.179		H033
X			Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X			Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X			Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X			Containers labeled accurately identify contents	SWMA		H037
				6018.403(b)		
		L		(2)		

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name	Dufant Automotive	ID Number <u>PAD003311884</u>	Date .	3/8	2000	_
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1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1			REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
			LQG TANKS (Subchapter J)			
	X		Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
			Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
			Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
			Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
	\coprod		Tanks labeled to accurately identify contents	265a.194		H044
			Required inspections completed and documented in operating log	265a.195	265.195	H045
			Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
			Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
H	И		Special small quantity generator requirements	265a.1	265.201	H048
\Box	7	 H	SQG TANKS			
	Χİ	Г	Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
			Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
	\prod		If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
			Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
	\prod		Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
	Ц	L	All waste removed at closure	265a.1	265.201(d)	H056
			Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
	\prod		Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
H	\prod		Incompatible waste requirements met	265a.1	265.201(f)	H059
H	1					

HAZARDOUS WASTE INSPECTION REPORT **GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS**

	Site Name _	DuPoint Automotive	ID Number <u>PADCC2311884</u>	Date 3 8 2000
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1 - No Violation Observed

2 - Not Applicable 3 - Not Determined 4 - Non Compliance

2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
			Containment Buildings (Subchapter T)			
X			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
\Box			Meets special requirements if liquids present	265a.1	265.1101(b)	H062
			Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1) (i)	H063
			Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1) (ii)	H064
			Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1) (iii)	H065
			No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1) (iv)	H066
			Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
V			Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
+		-				
 		-	Drip Pads (Subchapter S)			
X			Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
			Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
\coprod			(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
\coprod			(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
Ш			Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
\coprod			Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
\prod			Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
			Release reporting requirements met	265a.1	265.443(m)	H076
			Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

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COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

Generator I.D. # PADCO 331 1884	Telephone # (215) 539 - 6629
Site Name Dupont Labs-Marshall	Operator Name <u>Same</u>
Site Address 3500 Grays Ferry Avenue	Address
Philadelphia, PA 19146	
Municipality Philadelphia	County Philadelphia
Responsible Official John Weldon	Title Environmental Coordinator
Person Interviewed John Weldon	Title Environmental Coordinator
Inspector Aleta L. Finney	Time 2:30 pm
Inspection Date Inspection Type	Inspector I.D. # # Violation
[0]3 0 8 0 0	<u> </u>
INSPECTION TYPE	
01 Routine 04 Follow Up	07 Complaint
02 Spill Response 05 Sampling Only	y 08 Record Rev r 09 Other
Comment ID ICHUITH INTELL HINGE DIETATIO	101111111111
Comment RICIUTIINE IINSPECTI	
Waste Description: Industrial wastewater from spro	ai Daint hooths Waste Code:
Treatment	J
Type of Storage: Containers Tanks Piles Impo	pundments
Disposition: Destination Facility City of Phila Water 1	
Location 1100 Market St. Phila, DA	
Amount Generated: 276 tons/cjr	
	•••••
Waste Description: <u>Contaminated lab trash</u>	Waste Code:
Treatment Yes No Type	
Type of Storage: V Containers Tanks Piles Impo	
Disposition: Destination Facility	
Amount Generated: 4500 lb./mo.	Type
Amount Generated: TSEC lb./mo.	
Waste Description: Metal Cans	
Treatment	
Type of Storage: Containers Tanks Piles Impo	
Disposition: Destination Facility	
	Туре
Amount Generated: 620 Ib./mo.	
 	

Generator Name Dupont Automotive

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

1 = No Vic	plation Observed 2 = Not Applicable 3 = Not Determined		4 =	Non	-Com	pliance
Chapter Citation	Requirement		Sta	tus		Line
25 Pa Code	GENERAL PROVISIONS	1	2	3	4	Number
287.6	Designated facility: valid permit? Permit Number (PA) \000231864					3001
287.52(a)	Biennial report submitted by March 1 of each odd numbered year.	X				3002
287.53	Written source reduction strategy on file and in effect.	×				3003
287.53(b)	Waste reduction strategy covers all waste streams.	×	1			3004
287.53(c)	Reduction strategy updated every five years or when waste or manufacturing process changes.	X				3005
287.54	Waste analysis performed: copy on file.	X				3006
287.54(b, f)	Annual analysis or certification of waste submitted to Department and designated facility.	X				3007
287.55	Small quantity generator record keeping requirements.		X			3008
287.101(a)	Operation of disposal or processing facility without a permit.		X			3009
	STORAGE REQUIREMENTS					
299.111(1)	Residual waste not mixed with hazardous waste.	X				3010
299.111(2)	Waste stored as not to create a safety risk.	X				3011
299.111(3)	Residual waste not mixed with special handling waste.	×				3012
299.111(4)	Waste not blown or otherwise deposited outside storage area.	X				3013
299.112(c)	Storage area inspected; records available.	X				3014
299.113(a)	All waste stored less than one year.	X				3015
299.114(a)	Equipment maintained in operable condition.	X				3016
299.114(c)	Equipment cleaning frequencies maintained.	X				3017
299.115	Vectors controlled and public nuisances prevented.	X			1	3018
299.116(a)(b)	Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.	X				3019
299.116(c)	Waste stored to prevent groundwater degradation.	X				3020
299.121	Sufficient number of properly constructed storage containers.	×				3021
299.122	Storage tank design standards.		X			3022
299.112(d), 299.131(b)	No putrescible waste or liquid waste stored in piles.	Х				3023
299.131	Waste storage pile area properly designed, constructed and maintained.		X			3024
299.132	Storage pad or liner system properly designed and maintained.		X			3025
299.133	Proper design and maintenance of leachate and runoff control systems.		×			3026
299.151	Proper storage and containment of incinerator ash residue.		X			3027
299.152	Proper storage and containment of friable asbestos containing waste.		X			3028
299.153	Proper storage and containment of coal ash.		×			3029
299.154	Proper storage and containment of PCB containing waste material.	1	×			3030

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs

Identification Number: PAD002311884

Date of Inspection: Wednesday, March 8, 2000

A residual waste and large quantity hazardous waste generator inspection was conducted be Aleta L. Finney of the Department. Present from the facility was John Weldon, Environmental Coordinator and Victor Forte, Environmental Specialist.

Dupont-Marshall Labs is a research and development facility that creates paints. The Process Engineering area includes the laboratories, 2 resin buildings and a dispersion building. The laboratories design the paints. Three labs were inspected. Each lab contained two 5-gallon containers-one for aqueous and one for non-aqueous solutions. Each container was labeled hazardous waste and was lidded. The lab also produces residual wastes including contaminated lab trash (PPE, respirators, and pipettes) and metal cans (1/16 – 5-gallon).

There are also 6 satellite accumulation areas in the 2 resin buildings and the dispersion building. The resin buildings are where the pigments are created in large quantities. In the resin areas, 1 drum of Methyl Ethyl Ketone (MEK) and acetone, a second drum of MEK, toluene and xylene and a third of filter media were observed on each floor. There is a holding area outside of the 2 resin buildings where the full satellite drums are placed until they go into main storage. These drums are picked up on a daily basis. In the dispersion area, the pigments are evenly dissolved throughout the paint. A drum of MEK and acetone and another of MEK, toluene and xylene were both open because material was being actively added. Both were properly labeled.

Building 250 was then inspected. This building houses the facility's main storage area for both hazardous and residual wastes. Universal wastes and product are also stored here. Batteries, fluorescent bulbs, contaminated lab trash metal cans and hazardous waste drums are examples of the wastes that are stored here. The wastes are stored on racked shelving. The drums if hazardous wastes contained the same contents as those stored in satellite accumulation. The oldest accumulation date seen on any of the drums was February 2, 2000. All were properly labeled and in good condition. Secondary containment was present and the floor drains were clean. These drains connect to a sump to collect any spilled material. Lab pack material is also placed here and packaged in a smaller room next to the storage area.

Finally the paperwork was examined. Manifests were completed correctly and return copies were available. The facility takes a picture of each load and profiles it before shipment and LDR's are kept with each manifested shipment. Hazardous waste shipments are made from the facility almost weekly and residual waste shipments leave about every week to ten days. Both the residual and hazardous waste source reduction strategies were made available. However, the hazardous waste source reduction strategy was last completed in February 1992. This is contrary to §262a.100. Source reduction strategies should be updated every 5 years or when there is a change in the process. Mr. Weldon was sent 2

Signature by the person Interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signatur	or carry mailed to tacility	Date_3 29 00
Inspector Signature)	eta L. Finrey	Date 328/00
File name: Dupont Labs	d	Page <u>C</u> of ?

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

INSPECTION REPORT COMMENTS

Company/Facility/Site Name: Dupont Automotive-Marshall Labs

Identification Number: PAD002311884

Date of Inspection: Wednesday, March 8, 2000

booklets of the source reduction strategy so that this update could be completed. Mr. Weldon informed me that a completed, up-to-date source reduction strategy would be available in about a month from this inspection. Residual and hazardous waste biennial reports were also examined and complete. The PPC plan was also reviewed and was well-written. It was in the process of being updated and is updated annually. Annual personnel training records are also kept onsite. Inspection records of the main storage area were also complete.

One violation was observed.

The results of this inspection were reviewed with Mr. Weldon before leaving the facility.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) CCDU MOULE	d to facility	Date 3/29/00
Inspector Signature) Allta L. Trivilly		Date 3/26/00
File name: Dupont Labs	1	Page 9 of 9



Inspection Date	AUG-28,98
Time Start	
m. n	

П	AZARDOUS WASTE INSPECTION	REPORT
	GENERATOR	ENERATOR
Name of Inspector	Municipality Philo	D. Number <u>PADO0331788</u>
Name & Title of Responsi	tor Forte	Telephone (2/5 339 - (0/1)
	nt from above) 5 M C	
Amount of Hazardous Wa	ste Generated per Month: ~ 100 000 Po	ounds Kgs \mathcal{P}_{λ}
. Site Characterization		
STORAGE: To Cont	tainer 🛘 Tanks 🖫 Containment Bldg. 🗖 Dri	Pad Other
PBR:	tralization/WWTP	Other
Generator Treatment	☐ Containers ☐ Tanks ☐ Containe	nent Bldg. Drip Pad
2. Universal Waste:	Large Quantity Handler Small Quantity	Handler
Universal Waste 1	Types	· · · · · · · · · · · · · · · · · · ·
3. Hazardous Waste Tra	anenortare:	
	1	
Transporter Name	Marso 1	icense Number <u>NJ00074545</u> 44
Transporter Name Transporter Name	Mensol 1	icense Number <u>050003930707</u>
Transporter Name	Mensol 1	icense Number <u>050003930707</u>
Transporter Name Transporter Name Transporter Name	Mensol 1	icense Number <u>08003930707</u> icense Number <u>04/00474/54</u> 65
Transporter Name Transporter Name Transporter Name	Marisol 1 Dupout 1 Ross	icense Number <u>08003930707</u> icense Number <u>04/00474/54</u> 65
Transporter Name Transporter Name Transporter Name I. Types of hazardous	Waste Description	icense Number <u>08003930707</u> icense Number <u>0400474/54</u> 65 ion & type). Destination Facility
Transporter Name Transporter Name Transporter Name I. Types of hazardous	Waste Description Opduic Solvents, Paints, Juks	icense Number <u>08003930707</u> icense Number <u>04/00474/54</u> 65 ion & type). Destination Facility ROSS Duciperation
Transporter Name Transporter Name Transporter Name I. Types of hazardous	Waste Description Opduic Solvents, Points, Juks Ond Results	icense Number <u>08003930707</u> icense Number <u>0400474/54</u> 65 ion & type). Destination Facility ROSS Ducipeshow OHDO48415465
Transporter Name Transporter Name Transporter Name I. Types of hazardous	Waste Description Opduic Solvents, Paints, Juks	icense Number <u>08003930707</u> icense Number <u>04/00474/54</u> 65 ion & type). Destination Facility ROSS Duciperation
Transporter Name Transporter Name Transporter Name I. Types of hazardous	Waste Description Opduic Solvents, Points, Juks Ond Results	icense Number <u>08003930707</u> icense Number <u>0400474/54</u> 65 ion & type). Destination Facility ROSS Ducipeshow OHDO48415465
Transporter Name Transporter Name Transporter Name I. Types of hazardous	Waste Description Opduic Solvents, Points, Juks Ond Results	icense Number <u>08003930707</u> icense Number <u>04100474/54</u> 65 ion & type). Destination Facility ROD Duciperation OHDO48415465 Deposit
Transporter Name Transporter Name Transporter Name I. Types of hazardous	Waste Description Opduic Solvents, Points, Juks Ond Results	icense Number <u>08003930707</u> icense Number <u>04100474/56</u> 65 ion & type). Destination Facility ROSS Tuciperation OHDO48415665 Deposit NEDO02375738 Marsol
Transporter Name Transporter Name Transporter Name I. Types of hazardous	Waste Description Opduic Solvents, Points, Juks Ond Results	icense Number <u>08003930707</u> icense Number <u>04100474/54</u> 65 ion & type). Destination Facility ROD Duciperation OHDO48415465 Deposit
Transporter Name Transporter Name Transporter Name I. Types of hazardous	Waste Description Opduic Solvents, Points, Juks Ond Results	icense Number <u>08003930707</u> icense Number <u>04100474/56</u> 65 ion & type). Destination Facility ROSS Tuciperation OHDO48415665 Deposit NEDO02375738 Marsol

HAZARDOUS WASTE INSPECTION REPORT **GENERATORS -- SMALL QUANTITY GENERATORS**

Site Name Depost Automobile ID Number PROUD3/177 bate 405 28,98

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined 4 - Non Compliance

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
7				Hazardous waste determination performed on all waste streams	262.11	H001
X				Identification Number	262.12	H002
X				Licensed transporters only	262.12(b)	H003
ठ				TSD Authorization received for wastes shipped within PA	262.13	H004
X				Proper manifest used	262.20	H005
8				Manifests filled out correctly and completely	262.20(g)	H006
X				Manifests routed properly and within time limits	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262.34(a)	H008
χ				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262.34(e) (f)	H009
X				SQG waste accumulated on-site never exceeds 6000 kg	262.34(e)	H010
X				Satellite accumulation requirements complied with	262.34(c)	H011
X				Personnel training program per 265.16 complied with (Gen 262.34(a)(5); SQG 262.34(e))	262.34(a)(5), 262.34(e)	H012
X				Manifest and biennial reports retained for 3 years	262.40(a)(b)	H013
\mathbb{Z}				Specified records retained for 20 years	262.40(c)(e)	H014
X				Biennial reports submitted to the Department (LQG only)	262.41	H015
X				Exception reporting procedures followed	262.42	H016
X				Spill reporting procedures followed	262.46	H017
区				PPC plan developed and implemented	262.46	H018
X				Special requirements followed for international shipments	262.50	H019
X				Source reduction strategy prepared and available (LQG only)	262.80	H020
				Excluded waste complies with exclusionary requirements	261.4	H021
-						
<u></u>		L				

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Capart Autominia ID Number Philosoft 884 Date AUG 28,98

1 - No Violation Observed 2 - Not Applicable

3 - Not Determined 4 - Non Compliance

	3	REQUIREMENT	CHAPTER CIT.	LINE
		CONTAINERS (Subchapter I)		
X		Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
Y		Containers of hazardous waste in good condition	265.171	H026
λ		Containers and stored waste compatible	265.172	H027
X		Containers kept closed except during addition or removal of wastes	265.173	H028
X	L	Containers managed to prevent leaks	265.173(b)	H029
X_		Containers labeled to accurately identify contents	265.173(c)	H030
X		Container storage areas inspected at least weekly	265.174	H031
		Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
X		Proper containment and collection systems in place	265.178(a)-(d)	H033
X		All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
XI_		Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
				H036
				H037
				H038
		TANKS (Subchapter J)		
X		Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
X		Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
+		Secondary containment provided for tanks (systems) as required	265.193	H041
λ		Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
Y		Tanks labeled to accurately identify contents	265.194(d)	H043
χ		Required inspections completed and documented in operating log	265.195	H044
		Release reported to Department within 24 hours, unless exempted	265.196	H045
X		Special requirements for ignitable and reactive wastes followed	265.198	H046
	$\begin{bmatrix} \cdot \end{bmatrix}$	SQ Generator complies with 265.201	262.34(e)(3)	H047

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Dar Automotive ID Number PANCOF311884 Date BUG 28, 98

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

1	2	3		REQUIREMENT	CHAPTER CIT.	LINE
				Containment Buildings (Subchapter T)		
V				Building completely enclosed to prevent exposure to the elements	265.521(a)(1)	H048
X				Meets special requirements if liquids present	265.521(b)	H049
X				Primary barrier free of significant gaps, cracks and deterioration	265.521(d)(1)(i)	H050
K				Level of hazardous waste within unit is below containment walls	265.521(d)(1)(ii)	H051
X				Tracking of waste out of unit by equipment or personnel prevented	265.521(d)(1)(iii)	H052
X				No visible dust emissions at doors, windows, vents, etc.	265.521(d)(1)(iv)	H053
X			L	Professional engineer's certification placed in operating record	265.521(d)(2)	H054
स्				Required inspections performed and logged in operating record	265.521	H055
			_			H056
						H057
			L			H058
						H059
	\Box			Drip Pads (Subchapter S)		
X			_	Engineer's certification of existing drip pads on file	265.501	H060
X				Drip pad meets 265.503 design & operating standards	265.501	H061
X				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265.501(a)	H062
X				(b) Has synthetic liner below the pad with properly constructed leak detection system	265.501(b)	H063
χ				Drip pads & collection system maintained to prevent deterioration	265.503(c)	H064
X				Drip pads & collection systems designed to prevent run off	265.503(d)	H065
X				Run-on/run-off control system maintained unless pad protected by a structure	265.503(e)	H066
Y	\prod			Release reporting requirements met	265.503(m)	H067
X				Drip pads inspected weekly and after storms when in operation	265.504(b)	H068
						H069
						H070
						H071
						H072
	\prod	_[H073

Page 4 of

· ER-WM-129: Rev. 12/93

Person interviewed (signature)_Mailed to facility_

Inspector (signature)

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection Aug 28,1998	Identification Number	PAD002311884
•		
Company/Facility/Site Name <u>DuPont Automotive</u>		
A hazardous waste inspection was conducted by Environmental Specialist, was the facility guide. DuPos solvents, paints, inks, and resins (~100,000 lbs/month) and development activities. Hazardous wastes, which are generated in vario hazardous waste containment building. The hazardous secondary containment. The containers were properly le (NJD002454544), DuPont (DED003930807), and by Formal Policy (NJD002454544).	These wastes are generated the us labs throughout the plant, are waste containment building was abeled. Hazardous waste is transport to the plant of	mounts of waste organic rough various research e transported to a secured and had asported by Marisol
	1 1 1.41	
Hazardous waste manifests were made available A PPC plan, personnel training and source redu		d were current
NO VIOLATIO	NS OBSERVED	
110 120213333	/ 6	E .
This inspection report is notice of the findings of an inspection con any violations observed during the inspection. Additional notification of viola identified as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action in the local edition for any violation pated begin	tions may be issued concerning either violat	ions noted herein, or other violations
immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply cowas shown the report or that a copy was left with the person.	ncurrence with the findings on this report, b	ut does acknowledge that the person

Date_

Date_



Inspection Date	1/12/98
Time Start	11:50 an
Time Finish	1:15 pm

HAZARDOUS WASTE INSPECTION REPORT ☑ GENERATOR ☐ S Q GENERATOR

Со	mpany name <u>Dupo</u>	ent - Marshall Lab 1.	D. Number <u>PADDO 231 /884</u>
Sit	e Address <u>340</u>	1 Grays Ferry ALCHUIT	,
Co	unty Philadel	whia Municipality Philadelphi	a ZIP 19146
Na	me of Inspector	Chris Smolar	
Na	me & Title of Responsib	ole Official John G. Weldon	Environmen al wirder
Pe	rson Interviewed		elephone (<u>275</u>) <u>339 - 662 9</u>
		t from above)//	
Αn	nount of Hazardous Was	ste Generated per Month: <u>149,000</u> Por	unds Kgs
1.	Site Characterization		,
	STORAGE: X Cont	ainer 🔲 Tanks 🔲 Containment Bldg. 🔲 Drip	
	PBR: ☐ Neut	ralization/WWTP Reclaim	Other
			ent Bldg.
2.		Large Quantity Handler Small Quantity H	
	Universal Waste T	ypes Fluorescent Tubes, CarlTruc	k Katteries,
3.	Hazardous Waste Tra	•	
		Du Pont - Experimental Station	
	Transporter Name	Phillip Envicamental Li	cense Number
	Transporter Name Transporter Name	Phillip Envicannental Li	cense Number
4 .	Transporter Name Transporter Name	Phillip Envicamental Li	cense Number
1.	Transporter Name Transporter Name	Phillip Envicannental Li	cense Number
1.	Transporter Name Transporter Name Types of hazardous v Waste Code	Phillip Envicanmental Li vaste generated and destination facility (location Waste Description	cense Number cense Number on & type). Destination Facility
1.	Transporter Name Transporter Name Types of hazardous v Waste Code	Waste Description Mixed Solvents	cense Number cense Number on & type).
1.	Transporter Name Transporter Name Types of hazardous v Waste Code Ford Ford, Date (Ford Ford, Date (Waste Description Mixed Solvents Other flowed ble solvents paints	cense Number cense Number on & type). Destination Facility Peta Chan, IM I, Newel
1 .	Transporter Name Transporter Name Types of hazardous v Waste Code Fav3 Fav5, Dac 1 Fav3, Fav5, Dac 1 Fav3, Fav5, Dac 1	Waste Description Mixed Solvents	cense Number cense Number on & type). Destination Facility Peta Char, IN I, Newal
1.	Transporter Name Transporter Name Types of hazardous v Waste Code F003,F005, DCC F003,F005, DCC F003,F005, DCC F003,F005, DCC	Waste Description Mixed Solvents Other flammable solvents/paints Solid Waste (flambable) Contaminated Trash	cense Number cense Number on & type). Destination Facility Peta Chan, IM I, Nearl //
1.	Transporter Name Transporter Name Types of hazardous v Waste Code Fors, Fors, Dall Phillip Environmental Li vaste generated and destination facility (location Mixed Solvents Other flammable solvents/paints Solid Waste (flambable Contaminated Trash Aqueos waste liquid	cense Number cense Number on & type). Destination Facility Petro Chem , IM I , Necus I II Petro Chem , IM I	
1 .	Transporter Name Transporter Name Types of hazardous v Waste Code F003,F005, DCC F003,F005, DCC F003,F005, DCC F003,F005, DCC	Phillip Envicannessal Li vaste generated and destination facility (location Waste Description Mixed Solvents Other Flannable solvents/paints Solid Waste (floudable Contaminated Trash Aqueos waste liquid H-724 -NNP	cense Number cense Number on & type). Destination Facility Petro Chem , IM I , Necusion 11 11 Petro Chem , IM I 11
1.	Transporter Name Transporter Name Types of hazardous v Waste Code Four Four Four Four Four Four Four Four	Phillip Environmental Li vaste generated and destination facility (location Mixed Solvents Other flammable solvents/paints Solid Waste (flambable Contaminated Trash Aqueos waste liquid	cense Number cense Number on & type). Destination Facility Petro Chem , IMI , Nocuel 11 Petro Chem , IMI 11 11 11 11 11 11 11 11 11

Page _____ of ____

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name <u>Du Pont - MarskellLab</u>ID Number <u>PAD 00331/887</u> Date <u>1/12/98</u>

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

5 1		3		REQUIREMENT	CHAPTER CIT.	LINE
X	Ī			Hazardous waste determination performed on all waste streams	262.11	H001
X	T		_	Identification Number	262.12	H002
V	Γ	\Box		Licensed transporters only	262.12(b)	H003
X	\vdash			TSD Authorization received for wastes shipped within PA	262.13	H004
X	Γ	П		Proper manifest used	262.20	H005
X		П		Manifests filled out correctly and completely	262.20(g)	H006
				Manifests routed properly and within time limits	262.23	H007
X X				Generator waste accumulated on site for 90 days or less	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262.34(e) (f)	H009
	χ			SQG waste accumulated on-site never exceeds 6000 kg	262.34(e)	H010
X				Satellite accumulation requirements complied with	262.34(c)	H011
χ				Personnel training program per 265.16 complied with (Gen 262.34(a)(5); SQG 262.34(e))	262.34(a)(5), 262.34(e)	H012
X				Manifest and biennial reports retained for 3 years	262.40(a)(b)	H013
χ				Specified records retained for 20 years	262.40(c)(e)	H014
χ				Biennial reports submitted to the Department (LQG only)	262.41	H015
χ				Exception reporting procedures followed	262.42	H016
X				Spill reporting procedures followed	262.46	H017
X		\perp		PPC plan developed and implemented	262.46	H018
X				Special requirements followed for international shipments	262.50	H019
X			\perp	Source reduction strategy prepared and available (LQG only)	262.80	H020
X	-	\dashv	-	Excluded waste complies with exclusionary requirements	261.4	H021
			1			
\vdash	+	\dashv	+			
	+	\dashv	-			
\vdash	+	\dashv	+			
		#	1			

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Dupont - No	arshall Lab	ID Number <u>PADG</u>	0 <u>0311884</u> Date	1/13/98
1 - No Violation Obse			4 - Non Compliance	

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
				CONTAINERS (Subchapter I)		
χ				Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
<u>×</u>				Containers of hazardous waste in good condition	265.171	H026
X				Containers and stored waste compatible	265.172	H027
×				Containers kept closed except during addition or removal of wastes	265.173	H028
×				Containers managed to prevent leaks	265.173(b)	H029
X				Containers labeled to accurately identify contents	265.173(c)	H030
X				Container storage areas inspected at least weekly	265.174	H031
Χ				Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
X X				Proper containment and collection systems in place	265.178(a)-(d)	H033
×				All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
				TANKS (Subchapter J)	·	
	χ			Tanks labeled 'Hazardous Waste"	262.34(a)(4)	H039
	X			Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
	X			Secondary containment provided for tanks (systems) as required	265.193	H041
	X			Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
	X			Tanks labeled to accurately identify contents	265.194(d)	H043
	×			Required inspections completed and documented in operating log	265.195	H044
	X			Release reported to Department within 24 hours, unless exempted	265.196	H045
	X			Special requirements for ignitable and reactive wastes followed	265.198	H046
	χ			SQ Generator complies with 265.201	262.34(e)(3)	H047

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name	Dupost - M.	archall	ID Number PADEVA	311884	Date
	1 - No Violation Observed				

STATUS CHAPTER CIT. LINE 1 2 3 4 REQUIREMENT Containment Buildings (Subchapter T) H048 Building completely enclosed to prevent exposure to the 265.521(a)(1) X elements H049 Meets special requirements if liquids present 265.521(b) H050 265.521(d)(1)(i) χ Primary barrier free of significant gaps, cracks and deterioration H051 Level of hazardous waste within unit is below containment walls 265.521(d)(1)(ii) H052 Tracking of waste out of unit by equipment or personnel 265.521(d)(1)(iii) X prevented No visible dust emissions at doors, windows, vents, etc. 265.521(d)(1)(iv) H053 265.521(d)(2) H054 Professional engineer's certification placed in operating record H055 Required inspections performed and logged in operating record 265.521 H056 H057 H058 H059 Drip Pads (Subchapter S) 265.501 H060 Engineer's certification of existing drip pads on file 265.501 H061 Drip pad meets 265.503 design & operating standards (a) nonearthen, sloped construction with berm to channel 265.501(a) H062 associated drippage to collection system H063 (b) Has synthetic liner below the pad with properly constructed 265.501(b) leak detection system 265.503(c) H064 Drip pads & collection system maintained to prevent deterioration H065 Drip pads & collection systems designed to prevent run off 265.503(d) Run-on/run-off control system maintained unless pad protected 265.503(e) H066 by a structure H067 265.503(m) Release reporting requirements met H068. 265.504(b) Drip pads inspected weekly and after storms when in operation H069 H070 H071 H072

Page 4 of 8

H073

INSPECTION REPORT COMMENTS

Date of inspection	1/12/98	Identification Number	PAD0023/1884
		Marshall Lab	
			the Dupont re Chris Smelar, and John G. Wel
alace driver At	han ar JANG WARFE	IN arums v	types of wastes types of wastes hes, lab packs ere inspected. They and lab packs acks have been ation date seen
		floor drains a clogs and ele at area for spill	
The Proces Here the paints in larger quen Wastes here are drums are taken in this building. funnels in the b	Engineering be executed in preparated in preparated in preparated in to the 250 be All drams were una hole had li	cilding was example a for mass a satellite storage wilding. We full the properly laberate de over the full	mined next. es ore produced s production ge areas. Full drums were seen led. Drums having hoels.
		ing was insper laboratories has	
notification of any violations observed or other violations identified as a re This report does not cons imply immunity from legal action for	ed during the inspection. Additional sult of review of laboratory analyses stitute an order or other appealable a rany violation noted herein. interviewed does not necessarily im	notification of violations may be issued or Department records. action of the Department. Nothing con	of the Department. This report is formal concerning either violations noted herein, tained herein shall be deemed to grant or his report, but does acknowledge that the
Person interviewed (signatinspector (signature)	Christoffer Am	ility olan	Date 1/14/98 Date 1/13/98
	•		Page 5 of G

INSPECTION REPORT COMMENTS

Date of inspection	1/12	198	lder	ntification Numb	er P	10002311884
Company/Facility/Site I	Name	Dupont	- Mar	shall 1	ab	
hozardous was		•				The and
PPC plan	· CFL	examined.		ppear	70	se in order
No vial	ations	were o	bserved.		_	
					$\overline{}$	
					\	
	-					
	1					
notification of any violations ob or other violations identified as This report does not moly immunity from legal action	served during a result of revi constitute an i n for any viola	the inspection. Additi new of laboratory analy order or other appeals tion noted herein.	ional notification of yses or Department able action of the D	violations may be issued records. spartment. Nothing of	ed concerni ontained he	rein shall be deemed to grant or
Signature by the part person was shown the report or	on interviews that a copy w	ed does not necessar ras left with the perso	ity imply concurren n.	on with the findings o	n tinus report,	, but does acknowledge that the
Person interviewed (sig	nature)	Sent to	Facili	<i>\</i>	_ Date	1/14/78
nspector (signature)	Christy		olar	/	Date	1/12/98
						Page 6 of 6

- £R-WM-300: Rev. 11/93 Part A

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

Date of Inspection	1/2/97	Time start	Time finish	12:30 pm
Name of Inspector	Chils	Smilar		,
Company, installation r	name Downt	E. I. Neven	ours & Co	Inc.
Location	3401 G	rays Ferry	Avenue, Ph	14.PA 19156
County Philac				
Identification number_	/ ~ 4 11			
Name of responsible of	ficial Willia	n Gillan		
Title Safety	, Health, and	Medical M	1 ahager	
Mailing Address	Same as	above.	,	
Area code and telephon	e number <u>(2/5)</u>	339-655	>	
Name of person intervie	wed			- *** % c
Title				
Mailing address (if diffe	rent from above)			
Area code and telephon	e number			
1. Current waste han	dling method:			
a. On-site	70-20-20	storage,	disposal	□PBR
b. On-site		☐ reuse,	☐ recycle,	☐ recl aim
	Treatment,	storage,	□disposal	
d. ⊠Off-site		reu se ,	recycle,	⊠ recl aîm
2. Amount of hazard	ous waste produced:		₹ ® °	
	,600 1	bs de /mo.		
	us waste produced by		lumber and destinat	ion facility (include
Waste Number	Destination	n Facility	Location a	nd Type
FOOT, FOOT, DOOL	Nortrec Resi	owses	Detroit, M.	<u> </u>
/ /	Petrochipha		Detroit, M	<u>[</u>
	Dy Pont Co Ch	iambus Works	Deepunto, N	T
	Du Pont Exami	mental Station	Wilminston, AE	-
71	Charbons Harbons	·	Cinneinati,	Baltimor, Natice
der jos	Kolt Fur.	Serices	2 herrita	NJ
		1		_

Source Reduction: ☐ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Despont Conspany 10 Number PHD CL 2311884 Date 1/2/97

Hazardous Waste Inspection Report Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

	STA	1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Co		CHAPTER	LINE	
1	2	3	4	negomenter)	CITATION	ITEM
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
χ				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
X		5 •)	-	Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
ζ,				PA manifest used for intrastate shipments	262.20(b)	H005
K.				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	ноов
X			ä	roper U.S. DOT shipping containers or packages being used	262.30(1)	,H00 9
X				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	71010
				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
				Placards offered to transporter	262.33	H012
<				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
				a). All containers of haz, waste in good condition	265.171	H010
X				b). Containers compatible with hazardous waste being stored within	265 .172	H01
Z				c). Containers of hazardous waste kept closed	265 .173(a)	H01
<				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
		1,2	رخت	e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H02
				f). Haz. waste accumulation areas inspected at least weekly	265.174	H02
X.				g). Special requirements for ignitable, reactive and incompatible waste being metal.	265.176177	H02
Ċ				h). Proper containment and collection system(s)	265.178	H02
				Containers clearly marked with accumulation date and visible for inspection	262,34(a)(4)	H02
Ì				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H02

Hazardous Waste Inspection Report Generators - Part B

Generators - Part 8

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS		TATUS		REQUIREMENT	CHAPTER	LINE
1	1 2 3 4		4	REQUIREMENT	GTATION	ITEM
X				Records retained at designated location for 20 years	262.40(a)	H026
X				Quarterly reports submitted to the Department	262.41(a)	H027
X				Exception reporting procedures followed	262.42	H028
X				Hazardous waste disposal plan, if required	262.45	H029
X				Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
X				Special requirements followed for international shipments	262.50,.53, .55, .60	H032
X				Source reduction strategy prepared and available	262.80	H033

INSPECTION REPORT COMMENTS

Date of inspection 1/2/97 Identification Number PAI) CC03/188-4
Company/Facility/Site Name Dupont I. I. De Nemours Inc. (Nigrabal labs)
A routine inspection was conducted at the above
refirenced facility. Present during the inspection were
Chris Smolar of the Department and William Willow and
two other representating of Dupont Automotive
This facility is a lab which develops automobi
paints The facility consists of labs which develop the
paint, and then a semi-works which develops and engineers
the process of making the paint. The parats are those
Several labs were examined. All containers of
hardous waste in the labs are labelled. The mustes
are mostly MEK, Acetone, xylene, toluene, and other
Hanmable organic solvents.
The satellite accumulation areas were examined. All
drums were properly labelled. Only one loss than full
drumot each waste stream is in each area.
The 90 day drum storage area was inspected-all drums
were labelled properly and had accumulation dates of
The papernack was checked and found to be in order
No victations were observed. All previous victation are
corrected
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be saued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) Seuf to facility
Person interviewed (signature) Se4+ +6 +adlity Date 1/0/// Inspector (signature) Argue Angle Date 1/3/97
Page 4 of 4

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

Date of Inspection 5	7/20/9c T	ime start <u>/0: 0 C</u>	Time finish	
Name of Inspector ${\it Z}$	Mary alice 7	Peisse		
Company, installation	name EI. Put	Pont Co D	nc. Marsh.	all Laborato
Location <u>3401</u>	Gray's Ferr	y avenue	Phila PI	9 19156
County Phili		Municipality	Phila	
Identification number	PA 0 00 23	11884	· · · · · · · · · · · · · · · · · · ·	
	official William			
Title Manage	er: Sakety,	Health.	+ Medical	2
Mailing Address				
Area code and teleph	one number 215 -	339-6213	3	
	viewed <u>same.</u>			
Title				
Mailing address (if dif	ferent from above)			
Area code and teleph	one number			
Current waste ha	andling method:			
a. 🔲 On-site	_	storage,	disposal	☐ PBR
b. On-site	use,	reuse,	☐ recycle,	☐ reclaim
c. 💆 Off-site	. ☑ Ireatment,	storage,	disposal	
d. 🔲 Off-site		reuse,	☐ recycle,	☐ reclaim
2. Amount of haza	rdous waste produced:			
a. 150,00	0 168	i ./mo.		
•		kg./yr.		
3. Types of hazard location and type	dous waste produced by e).	Hazardous Waste	Number and destination	on facility (include
Waste Number	Destination	Facility	Location an	d Type
FOO3, FOOS, DOCI	Norther Resour	CEN	Retroit, MI	
	Petrochem		Detroit, MI	
	DuPont Co Chami	us works	Superater NJ	
	Dufont Experients	Station	Wilmington DE	
	ClianHailors		Cincinatti, Balt.	more Natick
	Rollins Env. S.	errices	Bridgeport, N.J	

Source Reduction: ☐ accomplished, ☐ proposed, ☑ not proposed

EK-WM-300: Rev. 11/93 Part B

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Marshal Laboratory ID Number PAD 002311884 Date 5/20/94

Hazardous Waste Inspection Report Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

				No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Co	ompliance	·
1	STA 2	TUS 3	REQUIREMENT		CHAPTER CITATION	LINE
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
×				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
K				PA manifest used for intrastate shipments	262.20(b)	H 0 05
ኦ				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
χ				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
Х				Proper U.S. DOT shipping containers or packages being used	262.30(1)	Н009
7				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
			X	Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
人				Placards offered to transporter	262.33	H012
χ				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
X				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
×				a). All containers of haz. waste in good condition	265.171	H016
K				b). Containers compatible with hazardous waste being stored within	265.172	H017
X				c). Containers of hazardous waste kept closed	265.173(a)	H018
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
χ				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
χ				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
þ				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176177	H022
メ				h). Proper containment and collection system(s)	265.178	H023
K				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
X			Γ	On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

Hazardous Waste Inspection Report Generators - Part B

3-Not-Determined 2-Not-Applicable 1-No Violation Observed 4-Non-Compliance STATUS LINE CHAPTER REQUIREMENT CITATION ITEM 2 3 Records retained at designated location for 20 years 262.40(a) H026 Quarterly reports submitted to the Department 262.41(a) H027 Exception reporting procedures followed 262.42 H028 Hazardous waste disposal plan, if required 262.45 H029 Spill reporting procedures followed H030 262.46(a) Preparedness, Prevention and Contingency Plan developed and H031 262.46(e) У implemented in accordance with Chapters 264 and 265 Special requirements followed for international shipments 262.50,.53, H032 .55, .60 Source reduction strategy prepared and available 262.80 H033

ER-WM-129: Rev. 7/95

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION **BUREAU OF WASTE MANAGEMENT**

INSPECTION REPORT COMMENTS
Date of inspection May 20, 1996 Identification Number PAD002311884
Company/Facility/Site Name E.I. DuPont Co. Inc. Marshall Laboratory
This inspection is followup to an EPA inspection done in response to the Southwest Philadelphia Initative Project. The facility does research to produce after market automotive paints. Research on resins and polymers are done to in order to create the best paint. 100-200 gallon batches of paint are also manufactured. Most of the hazardous waste that is generated in flammable. There are two areas which genreates hazardous waste. These are the Engineering Process Area, and the Labs. The waste is then
taken to Building 250 which is used to store hazardous waste, as well as flammable product.
The Engineering Process Area uses satellelite accumulation areas to accumulate the waste. It takes two to three days to fill a drum with waste and then the drum is marked with an accumulation date and sent to building 250. There are four satellite areas. Each drum contains a different type of waste, they are not mixed.
Building 250 is the hazardous waste storage area. The drums and containers are stored on shelves which are access with a forklift. The shelves reach to the ceiling. The facility should take care that the hazardous waste labels are facing outward, and visable for inspection. The building contains a sprinkler system, and secondary containment.
The labs each generates small quantities of hazardous waste in aqueous and non-aqueous forms. Both of these waste streams are collected in 5 gallon pails in each laboratory. When the pails are full, the waste is taken to building 250 where it is drummed and stored untill the waste is shipped offsite. The pails in the laboratory did not have hazardous waste labels on them. This is a violation of § 262.30(3). The facility should label these containers with the appropriate hazardous waste label.
Manifests and quarterly reports were inspected and no problems were found. The waste is shipped off of the site approximately every two weeks to a variety of different TSD facility's, all of which are out of state.
One (1) violation observed. MAR
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violation identified as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or implimmunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) sent to facility Date 5/30/94
Inspector (signature) Many alice Reusse Date 5/30/94

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Pennsylvania Department of Environmental Protection

Lee Park, Suite 6010 555 North Lane Conshohocken, PA 19428 May 29, 1996

Southeast Regional Office

610-832-6212 Fax 610-832-6143

NOTICE OF VIOLATION

Mr. William Gillan E.I. DuPont Company, Inc. Marshall Laboratory 3401 Gray's Ferry Avenue Philadelphia, PA 19156

Re: Haza

Hazardous Waste Inspection

Marshall Laboratory PAD002311884 Philadelphia

Dear Mr. Gillan:

As a result of the Department's May 20 inspection at Marshall Laboratory, 3401 Gray's Ferry Avenue, Philadelphia, the Department believes that Marshall Laboratory is in violation of the Solid Waste Management Act of the Commonwealth of Pennsylvania, Act of July 7, 1980 P.L. 380, as amended, 35 P.S. § 6018.101 et seq. ("SWMA"); The Clean Streams Law, Act of June 22, 1937, P.L. 1987, as amended, 35 P.S. § 691.1 et seq. ("CSL"); Section 1917-A of the Administrative Code of 1929, P.L. 177 as amended, 71.A § 510-17 ("Administrative Code"); and the Rules and Regulations promulgated thereunder, as follows:

A. Marshall Laboratory failed to label containers of hazardous waste with an appropriate hazardous waste label. There are small containers of hazardous waste in the in the labs which are not marked with a hazardous waste label. This is contrary to § 262.30(3).

The Department believes that the activities and conditions described in paragraph A above constitute a public nuisance pursuant to Section 601 of the SWMA, P.S. 35 § 6018.601 and Section 1917-A of the Administrative Code, P.S. § 510-17 and constitute unlawful conduct pursuant to Sections 6018.610(1), 6018.610(2), 6018.610(4) and 6018.610(9) of the SWMA, 35 P. S. §§ 6018.610(1), 6018.610(2), 6018.610(4) and 6018.610(9), and Section 611 of the CSL, 32 P.S. § 691.611.

In order to achieve compliance with the SWMA, CSL, and the Administrative Code, the implementation of the following is suggested:

1. All containers of hazardous waste should be labeled with an appropriate hazardous waste label with the information given in § 262.30(3).

The Department suggests that Marshall Laboratory submit to the Department within fifteen (15) days of receipt of this Notice of Violation a written report addressing the circumstances under which

these violations occurred, a proposed program and schedule for the abatement of these violations and a proposal to prevent their recurrence.

This letter does not impose any obligation upon Marshall Laboratory and shall not be construed as an appealable action or adjudication of the Department of Environmental Protection.

This Notice of Violation does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Protection, heretofore or hereafter existing.

If you have any questions concerning this matter, please feel free to contact this office at the above number.

Sincerely,

Mary Alice Reisse

Waste Management Specialist

May alia Rasse

Waste Management

Re 30 (AM)150-8